



Region 2

**ACKNOWLEDGEMENT OF NOTIFICATION
OF
HAZARDOUS WASTE ACTIVITY**

11/18/2008

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER: NJD063144109

INSTALLATION NAME: MERRILL LYNCH PRODUCTION TECHNOLOGIES

INSTALLATION ADDRESS : 4 CORPORATE PLACE
PISCATAWAY, NJ 08854

MAILING ADDRESS : 4 CORPORATE PLACE
PISCATAWAY, NJ 08854

EPA Form 8700-12AB (4-80)

**USEPA - REGION 2
RCRA Programs Branch
290 Broadway, 22nd Floor
New York, NY 10007-1866**

**ATTN: RCRA NOTIFICATIONS
Tel : (212) 637-4106
Fax: (212) 637-4437**

**TO: MERRILL LYNCH PRODUCTION TECHNOLOGIES
or Current Occupant
ATTN: GENE PASTRICK
4 CORPORATE PLACE
PISCATAWAY, NJ, 08854**



**SEND COMPLETED
FORM TO:**
The Appropriate State or
EPA Regional Office.

United States Environmental Protection Agency

RCRA SUBTITLE C SITE IDENTIFICATION FORM

**1. Reason for
Submittal**
(See instructions
on page 13.)

MARK ALL BOX(ES)
THAT APPLY

Reason for Submittal:

- ☐ To provide Initial Notification of Regulated Waste Activity (to obtain an EPA ID Number for hazardous waste, universal waste, or used oil activities)
- ☒ To provide Subsequent Notification of Regulated Waste Activity (to update site identification information)
- ☐ As a component of a First RCRA Hazardous Waste Part A Permit Application
- ☐ As a component of a Revised RCRA Hazardous Waste Part A Permit Application (Amendment # _____)
- ☐ As a component of the Hazardous Waste Report

**2. Site EPA ID
Number (page 14)**

EPA ID Number

N J D 0 6 3 1 4 4 1 0 9

**3. Site Name
(page 14)**

Name: Merrill Lynch Production Technologies

**4. Site Location
Information
(page 14)**

Street Address: 4 Corporate Pl.

City, Town, or Village: Piscataway

State: NJ

County Name: Middlesex

Zip Code: 08854

**5. Site Land Type
(page 14)**

Site Land Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

**6. North American
Industry
Classification
System (NAICS)
Code(s) for the
Site (page 14)**

A.

5 1 1 1 4 0

B.

C.

D.

**7. Site Mailing
Address
(page 15)**

Street or P. O. Box: same

City, Town, or Village:

State:

Country:

Zip Code:

**8. Site Contact
Person
(page 15)**

First Name: Gene

Mi: L

Last Name: Pastrick

Phone Number: 732-878-6578 **Extension:**

Email address:
Gene_Pastrick@ml.com

**9. Operator and
Legal Owner
of the Site
(pages 15 and 16)**

A. Name of Site's Operator:
Merrill Lynch Production Technologies

Date Became Operator (mm/dd/yyyy):
01/01/1999

Operator Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

B. Name of Site's Legal Owner:
Merrill Lynch Pierce and Fenner

Date Became Owner (mm/dd/yyyy):
01/01/1990

Owner Type: ☒ Private ☐ County ☐ District ☐ Federal ☐ Indian ☐ Municipal ☐ State ☐ Other

9. Legal Owner (Continued) Address	Street or P. O. Box: same	
	City, Town, or Village:	
	State:	
	Country:	Zip Code:

10. Type of Regulated Waste Activity
Mark "Yes" or "No" for all activities; complete any additional boxes as instructed. (See instructions on pages 17 to 20.)

A. Hazardous Waste Activities
Complete all parts for 1 through 6.

☒ ☐ **1. Generator of Hazardous Waste**
If "Yes", choose only one of the following - a, b, or c.

☐ a. LQG: Greater than 1,000 kg/mo (2,200 lbs./mo.) of non-acute hazardous waste; or

☐ b. SQG: 100 to 1,000 kg/mo (220 - 2,200 lbs./mo.) of non-acute hazardous waste; or

☒ c. CESQG: Less than 100 kg/mo (220 lbs./mo.) of non-acute hazardous waste

In addition, indicate other generator activities.

☐ ☐ d. United States Importer of Hazardous Waste

☐ ☐ e. Mixed Waste (hazardous and radioactive) Generator

☐ ☐ **2. Transporter of Hazardous Waste**

☐ ☐ **3. Treater, Storer, or Disposer of Hazardous Waste (at your site)** Note: A hazardous waste permit is required for this activity.

☐ ☐ **4. Recycler of Hazardous Waste (at your site)**

☐ ☐ **5. Exempt Boiler and/or Industrial Furnace**
If "Yes", mark each that applies.

☐ a. Small Quantity On-site Burner Exemption

☐ b. Smelting, Melting, and Refining

☐ ☐ **6. Underground Injection Control**

B. Universal Waste Activities

☐ ☒ **1. Large Quantity Handler of Universal Waste (accumulate 5,000 kg or more) [refer to your State regulations to determine what is regulated]. Indicate types of universal waste mark all boxes that apply:**

	<u>Manage</u>
a. Batteries	<input type="checkbox"/>
b. Pesticides	<input type="checkbox"/>
c. Mercury containing equipment	<input type="checkbox"/>
d. Lamps	<input type="checkbox"/>
e. Other (specify) _____	<input type="checkbox"/>
f. Other (specify) _____	<input type="checkbox"/>
g. Other (specify) _____	<input type="checkbox"/>

☐ ☒ **2. Destination Facility for Universal Waste**
Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities
Mark all boxes that apply.

☐ ☒ **1. Used Oil Transporter**
If "Yes", mark each that applies.

☐ a. Transporter

☐ b. Transfer Facility

☐ ☒ **2. Used Oil Processor and/or Re-refiner**
If "Yes", mark each that applies.

☐ a. Processor

☐ b. Re-refiner

☐ ☒ **3. Off-Specification Used Oil Burner**

☐ ☒ **4. Used Oil Fuel Marketer**
If "Yes", mark each that applies.

☐ a. Marketer Who Directs Shipment of Off-Specification Used Oil to Off-Specification Used Oil Burner

☐ b. Marketer Who First Claims the Used Oil Meets the Specifications

11. Description of Hazardous Wastes (See instructions on page 21.)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more spaces are needed.

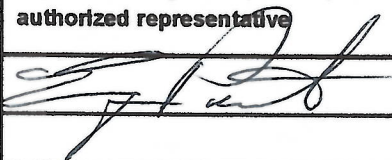
B. Waste Codes for State-Regulated (i.e., non-Federal) Hazardous Wastes. Please list the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use an additional page if more spaces are needed for waste codes.

12. Comments (See instructions on page 21.)

NAME CHANGE

13. Certification. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

For the RCRA Hazardous Waste Part A Permit Application, all operator(s) and owner(s) must sign (see 40 CFR 270.10 (b) and 270.11). (See instructions on page 21.)

Signature of operator, owner, or an authorized representative	Name and Official Title (type or print)	Date Signed (mm/dd/yyyy)
	Gene Pastork EHS MGR	9-17-08

John DeRose
VP Grp Services

Facility: TriTech Services		Loc: Middlesex		SIC:		
ID: NJDO63144109		Insp Date: 8/2/93		Revw Date: 11/2/93		
Fac Pers: Glenn Bonetti		Region: Central		Revw: Kelly		
Title: Maintenance Super.		Insp:		Notif Date:		
Tele: 908-878-6402		Insp Type:		Stat: File NOV 2007		
Site: Gen Trans TSD		State Act:		Initiate:		
Recv TSD:		Refer:		On Prog:		
Vol/Mo:		Trans Units:		Comm Date:		
GW Wells:		Stor Units:		S Info:		
Permits:		Waste Codes:				
Operation: Prepares and prints financial statements						
Insp Comm (date, re, outcome):						
Process: Printing and graphics area generates hazardous wastes, Warehouse receiving, postal services, Electronic publishing.						
MW Gen:						
D005 (Waste Ink)						
D001 (Cleaning, Blankets)						
Waste Codes:						
TSD:						
Doc Req:						
Fac Comm (date, re, outcome):						
MW Det: Knowl: TCA: TCLP:						
Manf Rev: 9 Out / Code: LDR: Stor:						
Manf Date Code Det						
Doc Req:						
TSD Comm (date, re, outcome):						
Findings:						
- Reporting Requirements not fulfilled						
- Accumulation date not marked on container						
- Storing without permit						
- "Hazard Waste" not marked on container						
Comp Sched: Achieved:						
Stat (v, ep, ref):						
Compl Hist: C. Plan not prepared						
Date Viol Class Act						
- Inadequate management of containers						
- Daily inspection of container storage not conducted						
- OTH not provided for personnel						
- Aisle space inadequate						
Reg Docs: Local authorities not provided w/ info.						
File Docs:						
EPA Action	Date Issued	Due Date	Extension Req	New Date	Date Rec'd	Stat/Comments
1						

FILE #: 12 - 17 -

NEW JERSEY DEPARTMENT OF ENVIRONMENTAL PROTECTION
& ENERGY

DIVISION OF FACILITY WIDE ENFORCEMENT

BUREAU: CBWHWE

GENERATOR INSPECTION REPORT

FACILITY INFORMATION

FACILITY NAME: TRITECH SERVICES

EPA ID NUMBER: ND063144109 CASE NUMBER: _____

STREET ADDRESS: FOUR CORPORATE PLACE

MUNICIPALITY: PISCATAWAY ZIP: 08854 COUNTY: MIDDLESEX

MAILING ADDRESS: _____
(if different)

BILLING ADDRESS: _____
(if different)

TELEPHONE # (908) 878-6402 FAX # (908) 878-6597

BLOCK : 461.3 LOT : 2.02

FACILITY PERSONNEL: GLENN BONETTI, MAINTENANCE SUPERVISOR.
(name & title) JOHN DEROSE, V.P. CORPORATE SERVICES.

INSPECTION DATE: AUGUST 2, 1993

INSPECTOR'S NAME & TITLE: DOUGLAS GREENFIELD, PRIN. ENV. ENG.

OTHER STATE/EPA PERSONNEL: _____

REPORT PREPARED BY: DOUGLAS GREENFIELD.

REVIEWED BY: _____ DATE OF REVIEW: _____
DFWE 29 REV. 2/22/93

INSPECTION & GENERAL FACILITY DESCRIPTION & OPERATIONS

Titelink is located in Piscataway, Middlesex County in a 160,000 square foot building. There are 200 employees who cover 21 shifts per week. The company is a Merrill Lynch Company and is a financial service company that prepares and prints financial statements, proxy's, and prospectus.

The company is divided into 5 units of which one is warehousing, shipping, and receiving of the material needed to produce the printing and mailings.

The second area is the mailing and inserting. There is a postal official on site to help with the mailing of up to 2 million pieces a day. Over 65 million pieces are mailed for over 1000 corporations. Stockholder information is printed out and inserted into envelopes automatically, sealed and mailed.

The third area is the Electronic Publishing. This is done by computer printing on 40 laser printers and turns out 10 million pages a day. Binding of these publications are done at the

add additional pages as needed

INSPECTION & GENERAL FACILITY DESCRIPTION & OPERATIONS

binding area

The fourth area is the proxy Corporate Service where the proxy's are printed and mailed. They receive over 300,000 vote returns daily. These are scanned and tabulated.

The fifth area is the printing operations and graphics. This is the only area generating hazardous waste. This area has 4 presses which can produce Multi-phase or multi-color printing. The majority printings for corporations include Quarterly Reports, Annual Reports, Proxy Statements, Research Reports, Marketing Brochures, and Pamphlets. After these are printed they are sent to the cutting, folding, binding area where they are completed for mailing.

Checked the manifest and found no return copy for NHA 1552398 shipped on 12-30-92. Found that the company was deficient in not having a contingency plan or a training program for the personnel concerning hazardous waste. They also failed to make required arrangements

with the local authorities.

Toured the facility going to the storage room. Mr. Bonetti indicated that nine of the drums in the room were hazardous waste. There was no aisle space to get to the drums for inspection and not labeled. Inquired if the area was inspected daily and was told that it was not.

Continued to the graphics where the presses are located. This is the area where the hazardous waste is generated. Between two presses there were two hazardous waste cabinets, one containing a drum of waste blanket wash and the second a drum of waste ink. Both drums were not securely closed and were not labeled

"Hazardous Waste". Went to the other two presses and found one H.W. cabinet with a drum of waste ink and not labeled and opened.

Continued to the cutting, folding, and binding area and observed no hazardous waste. The tour of the warehouse and mailing distribution service area and found no H.W. being generated in

these areas.

Returned to the office and issued the following NOV's:

NSAC-7:26-7.4(h) Failure of generator to comply with reporting requirements.

NSAC-7:26-9.3(c) 3 Failure of Generator to clearly mark containers with date when accumulation period begins or to make mark visible for inspection

NSAC 7:26-9.3(d) 2 Failure of generator accumulating hazardous waste on-site without a permit to place waste in containers meeting standards of NSAC 7:26-7.2 or to appropriately manage containers.

NSAC 7:26-9.3(d) 4 Failure of generator to mark container with the words "HAZARDOUS WASTE"

NSAC 7:26-9.4(d) 4 Failure of facility owner or operator to comply with any of the requirements for management of containers

SPECIFICALLY (d) 4 v

NSAC 7:26-9.4(d) 5 Failure of facility owner or operator to perform daily

inspections of each area were
contained and stored.

NSAC 7:26-9.4(3) Failure of facility owner
or operator to provide required
classroom or on-the-job training
for facility personnel.

NSAC 7:26-9.6(e) Failure of facility owner
or operator to maintain sufficient
aisle space for unobstructed
movement of personnel or equipment
in an emergency.

NSAC 7:26-9.6(f) Failure of facility owner
or operator to make required
arrangements with police or
fire departments, emergency
response, contractors, equipment
suppliers, or local hospitals or
to document any such authority's
refusal of such arrangements.

NSAC 7:26-9.7(a) Failure of facility owner
or operator to have contingency plan
designed to minimize hazards
to human health and environment.

INSPECTION DATE(S): _____
TIME IN: _____
TIME OUT: _____

PHOTOS TAKEN: YES (____) NO (____) QUANTITY (____) ATTACH
PHOTO LOG

SAMPLES TAKEN: YES (____) NO (____) HOW MANY (____) ATTACH
SAMPLE LOG

SITE BACKGROUND INFORMATION

EMPLOYEES: 200 SHIFTS/WEEK: 21
DATE OPERATIONS BEGUN: MAY 1990 SIC CODE: _____
ACRES: ? # OF BUILDINGS/SQFT: 1 / 160,000
PRODUCTS PRODUCED: FINANCIAL PRINTING (PROXY, PROSPECTUS,
PHAMPHLETS ETC) AND MAILING DISTRIBUTION
PREVIOUS OPERATIONS AT SITE: NISSAN PARTS DISTRIBUTION
WAREHOUSE
WATER SUPPLY- PUBLIC: ✓ PRIVATE WELL: _____
SOLID WASTE DISPOSAL: _____
FLOOR DRAINS: YES TO STORM SEWER
DRAINS CONNECTED TO- POTW: _____ SEPTIC SYSTEM: _____
MONITORING WELLS: NONE

NON-HW. TANKS ON SITE : NONE

AIR PERMITS: YES

NJPDES PERMITS: NONE

OTHER PERMITS: NONE

OFFICE AREA

PRINT
POOL

MAILING
DISTRIBUTION
SERVICES

WAREHOUSE

AIMES
ROOM

GRAPHICS

PRESS

ELECTRIC
ROOM

STRIPPING

PRESS

DRUM
STORAGE

CUTTING
FOLDING
BINDING
AREA

PLATE

PRESS

AIR
COND.
ROOM

GRAPHICS
PREP

PRESS

HW SATELLITE -
CABINETS

NOT TO SCALE

HAZARDOUS WASTE INVENTORY

[illegible]

add additional pages as needed

GENERATOR INDEX

CHECK THE SECTIONS AND ACTIVITIES OF THIS REPORT WHICH ARE APPLICABLE TO THE FACILITY AND COMPLETE THOSE SECTIONS FOR THIS INSPECTION.

GENERATOR WASTE MANAGEMENT PRACTICES

<u>#</u>	<u>SECTION</u>	<u>PAGE</u>
1.	WASTE DETERMINATION	7. <u>✓</u>
2.	GENERATOR STATUS	8. <u>✓</u>
3.	SATELLITE STORAGE AREAS	9. <u>✓</u>
4.	< 90 DAY CONTAINER STORAGE AREAS	10. <u>✓</u>
5.	WASTE OIL USAGE	11. <u>✓</u>
6.	< 90 DAY ABOVE GROUND TANKS STORAGE AREAS	12. <u> </u>
7.	WASTE MANAGEMENT PRACTICES	13. <u>✓</u>
8.	GENERATOR MANIFESTS	14. <u>✓</u>
9.	EXPORTING HAZARDOUS WASTE	16. <u> </u>
10.	CONTINGENCY PLAN & EMERGENCY PROCEDURES	17. <u>✓</u>
11.	PERSONNEL TRAINING	19. <u>✓</u>
12.	PREPAREDNESS & PREVENTION	21. <u>✓</u>
13.	"WASTE WATER TREATMENT UNIT" QUALIFICATION	23. <u> </u>

SECTION 1.WASTE DETERMINATION:

YES NO

DOES the facility generate "solid waste". ✓ _____DOES the facility generate a "hazardous waste". ✓ _____IS THE FACILITY CORRECTLY CLASSIFYING ITS WASTES? ✓ _____

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

8.5(a) Generator failed to determine
if its "solid waste" is hazardous? _____7.4(x) Generator FAILED to properly classify
its waste according to the "Hierarchy". _____COMMENTS

SECTION 2.

GENERATOR STATUS

YES NO

Does the generator generate/accumulate >100 kg of hazardous waste (1kg acutely) or greater than 1001 gal of listed waste oil in any calender month?
(except x725 - 100 kg rule applies)

✓

IF YES,

7.4(a)1 Does the Generator have an EPA ID number.

✓

IF THE GENERATOR IS A SQG.,

Does the generator wish to deactivate his EPA ID. number?

COMMENTS

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SECTION 3.SATELLITE ACCUMULATION AREAS

IS THE FACILITY IN COMPLIANCE WITH THE
SATELLITE ACCUMULATION REGULATIONS?

YES NO

_____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.3(d)1 Quantity of waste EXCEEDS 55 gal. or
1 qt. of acutely hazardous waste.

9.3(d)2 Containers FAIL to:

Meet the standards of 7.2
(Container Requirements).

Poor or leaking container.

Container made of incompatible material.

Container not kept securely closed.

_____ ✓

9.3(d)3 Accumulation area is:

NOT at or near a point of generation.

NOT under the control of the operator.

9.3(d)4 Containers are NOT marked
"Hazardous waste".

_____ ✓

9.3(d)5 Containers NOT marked with date
when filled.

9.3(d)6 Containers were NOT moved from
satellite area within three days.

COMMENTS

SECTION 4.GENERATOR CONTAINER STORAGE AREAS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
GENERATOR STORAGE REGULATIONS?

_____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

7.2(a)	<u>NO</u> manifest number on containers ready for disposal.	_____
7.2(b)	Containers <u>FAILED</u> to meet DOT regulations. (49 CFR 171,179)	_____
9.3(a)1	Waste <u>ACCUMULATED</u> OVER 90 DAYS.	_____
9.3(a)3	Containers <u>NOT</u> marked with accumulation start date or "Hazardous Waste".	_____ ✓
9.4(d)1i	Containers <u>NOT</u> of adequate construction.	_____
9.4(d)1ii	Closures <u>NOT</u> of sufficient strength.	_____
9.4(d)2	Containers <u>NOT</u> in good condition.	_____
9.4(d)3	Containers <u>NOT</u> compatible with waste.	_____
9.4(d)4i	Containers <u>NOT</u> kept closed.	_____
9.4(d)4iii	Containers <u>NOT</u> properly handled.	_____
9.4(d)4iv	Hazardous wastes <u>NOT</u> segregated.	_____
9.4(d)4v	ID Labels <u>NOT</u> visible.	_____ ✓
9.4(d)5	Accumulation area <u>NOT</u> inspected daily.	_____ ✓
9.4(d)6	Containers of ignitable and reactive wastes are <u>NOT</u> located at least 50 feet from the facility's property line.	_____
9.6(d)	Access to communication or alarm system is <u>NOT</u> maintained.	_____
9.6(e)	<u>INADEQUATE</u> aisle space.	_____ ✓

SECTION 5WASTE OIL

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE
WASTE OIL STORAGE REGULATIONS?

✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

The generator ONLY generates or accumulates less
than 1001 gals. of waste oil per month and:

7.7(d) Generator FAILED to obtain receipts
and retain them for three years.

9.2(b) If under ground tanks are used to
store waste oil, the generator
is NOT a:

1. New commercial service
station waste oil tanks
of <1001 gal capacity*

or does NOT:

2. Use underground tanks in
existence and in use for
Hazardous Waste storage
prior to 1/17/83.

NOTE: If the generator accumulates over 100 kg of
hazardous waste and <1001 gal of waste oil,
he must manifest off the waste oil but does
not have to comply with subchapter 9 require-
ments for waste oil. If the generator accum-
ulates >1001 gal of waste oil in any given
month he MUST be in compliance with ALL
generator requirements.

COMMENTS:

SECTION 6.ABOVE GROUND TANKS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE ABOVE
GROUND <90 DAY STORAGE TANK REGULATIONS?

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

If the generator stores hazardous waste in an above ground
tank for <90 days, the generator FAILED to:

- 9.3(b) Have a letter of approval? _____
- 9.3(b)2 Have overfilling controls? _____
- 9.3(b)3 Have secondary containment? _____
- 9.3(b)4 Insure that 99% of the tank can be
emptied? _____
- 9.3(b)5 Empty the tank every 90 days? _____
- 9.3(b)6 All wastes removed from the tank(s)
to authorized facility? _____
- 9.3(b)8 If part of the tank is below grade, all
of the tank cannot be visually inspected. _____
- 9.3(b)9 The tank is not labeled with the
words "HAZARDOUS WASTE". _____

COMMENTS

SECTION 7.

WASTE MANAGEMENT

IS THE FACILITY IN COMPLIANCE WITH THE WASTE
MANAGEMENT REGULATIONS?

YES NO

✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

12.1(a) Generator IS ACTING as a TSDF by:

1. Treating hazardous waste. _____
2. Storing hazardous waste. _____
3. Disposing of hazardous waste on
site? _____

9.3(a)1 The generator FAILS to ship hazardous waste off site within 90 days.

9.2(a)2 Hazardous waste IS handled in a manner which causes or may cause a spill. _____

N.J.S.A. 58:10-23.11(c)

Discharge of a hazardous substance. _____

N.J.S.A. 58:10-23.11(e)

Failure to report the discharge. _____

IF THE FACILITY IS ACTING AS A TSDF, COMPLETE THE TSD REPORT.

COMMENTS:

SECTION 8.GENERATOR MANIFESTS

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE GENERATOR
MANIFEST REGULATIONS?____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE

7.4(a)3	Generator <u>FAILED</u> to prepare a Hazardous Waste Manifest.	_____
7.4(a)4	Each manifest <u>failed</u> to have the following information:	
7.4(a)4i	Generator's name, mailing address (site address if different), and phone number.	_____
7.4(a)4ii	The generator's EPA ID number.	_____
7.4(a)4iii	The transporter(s) name, phone number, NJ registration and decal numbers.	_____
7.4(a)4iv	The transporter(s) EPA ID number.	_____
7.4(a)4v	The name, address and phone number of the designated TSD facility.	_____
7.4(a)4vi	The TSDF's EPA ID number.	_____
7.4(a)4vii	The proper USDOT description.	_____

OR

	Complete NOS information in item J.	_____
7.4(a)4viii	Special handling instructions.	_____
7.4(a)5i	The generator signature.	_____
7.4(a)5ii	Transporter's signature & date.	_____
7.4(a)5iii	Generator <u>FAILED</u> to retain copy and forward copies to the state of origin & state of destination.	_____
7.4(a)5v	Generator <u>FAILED</u> to give the remaining copies to hauler.	_____

- | | | |
|---------|--|---------|
| 7.4(e)2 | Generator <u>FAILED</u> to use a registered Transporter. | _____ |
| 7.4(e)3 | Generator <u>FAILED</u> to designate an authorized TSD or reuse facility. | _____ |
| 7.4(e)4 | Generator <u>FAILED</u> to utilize an authorized TSD. | _____ |
| 7.4(f) | Generator <u>FAILED</u> to maintain the following facility records for three (3) years: | |
| 7.4(f)1 | Manifests. | _____ |
| 7.4(f)2 | Annual and/or exception reports. | _____ |
| 7.4(f)3 | Generator <u>FAILED</u> to maintain records during the course of unresolved enforcement action or as requested. | _____ |
| 7.4(h)1 | When the generator has <u>FAILED</u> to receive signed copies of all manifests, he <u>FAILED</u> to notify the TSD or Department within 35 days. | _____ ✓ |
| 7.4(h)2 | Generator <u>FAILED</u> to file exception reports within 45 days. | _____ ✓ |

COMMENTS :

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SECTION 9.

HAZARDOUS WASTES EXPORTATION

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE EXPORT
REQUIREMENTS OF THE REGULATIONS?

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

Generator FAILED to:

- 7.4(b) Notify the EPA of its intent to export. _____
Obtain acknowledgement of consent
from the receiving country. _____
- 7.4(c) Provide the information required in
N.J.A.C. 7:26-7.4 ET. SEQ.to the EPA. _____
- 7.4(c)7 Insure that the acknowledgement is
attached to each manifest. _____
- 7.4(c)8 Deliver a copy of the Manifest to
Customs at the point of departure? _____
- 7.4(g)4 Submit an annual report to the EPA? _____

COMMENTS:

SECTION 10.CONTINGENCY PLAN AND EMERGENCY PROCEDURES

YES NO

IS THE FACILITY IN COMPLIANCE WITH THE CONTINGENCY
PLAN & EMERGENCY PROCEEDURES REGULATIONS? /

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

- | | | |
|--------|--|----------------------------|
| 9.7(a) | <u>NO</u> written contingency plan. | <u> </u> <u> / </u> |
| 9.7(b) | Generator <u>FAILED</u> to implement the plan in an emergency. | <u> </u> |
| 9.7(c) | Plan <u>FAILED</u> to describe the response actions facility personnel and local authorities shall take. | <u> </u> |
| 9.7(d) | Generator has a DPCC or SPCC plan, and <u>FAILED</u> to amend that plan to incorporate hazardous waste management. | <u> </u> |
| 9.7(e) | Plan <u>FAILS</u> to describe arrangements agreed to by local authorities. | <u> </u> |
| 9.7(f) | Plan <u>FAILS</u> to list names, addresses, and phone numbers (office and home) of emergency coordinators. | <u> </u> |
| 9.7(g) | Plan <u>FAILS</u> to include a list, location, AND CAPABILITIES of all emergency equipment. | <u> </u> |
| 9.7(h) | Plan <u>FAILS</u> to describe evacuation procedures, evacuation signal(s) AND routes. | <u> </u> |
| 9.7(i) | Generator <u>FAILED</u> to: | |
| | 1. Keep a copy of the plan at the facility. | <u> </u> |
| | 2. Submit the contingency plan to local authorities. | <u> </u> |

9.7(j) Generator FAILED to revise the contingency plan when:

1. Applicable regulations are revised. _____
2. The plan fails. _____
3. The facility changes. _____
4. The Emergency Coordinator changes. _____
5. The emergency equipment changes. _____

9.7(k) Emergency coordinator NOT available. _____

COMMENTS

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SECTION 11.PERSONNEL TRAINING

IS THE FACILITY IN COMPLIANCE WITH THE
PERSONNEL TRAINING REGULATIONS?

YES NO

_____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

NO TRAINING PROGRAM

- 9.4(g)2 Training program NOT directed by a person trained in hazardous waste management procedures and, is it NOT designed to ensure that facility personnel are able to respond effectively. _____
- 9.4(g)3 Program FAILS to include the following response procedures:
- 9.4(g)3i Use of personnel safety equipment. _____
- 9.4(g)3ii Procedures for using facility emergency and monitoring equipment. _____
- 9.4(g)3iii Key parameters for automatic waste feed cut-off systems. _____
- 9.4(g)3iv Procedures for utilizing communications or alarm systems. _____
- 9.4(g)3v Response procedures for fires & explosions. _____
- 9.4(g)3vi Ground water contamination responds procedures. _____
- 9.4(g)3vii Shutdown procedures. _____
- 9.4(g)4 Personnel have NOT successfully completed training within six months of the date of their employment or assignment to a new position at the facility. _____
- 9.4(g)5 Personnel do NOT take part in an annual review of training. _____
- 9.4(g)6 NO written documentation of the following:
- 9.4(g)6i Job title for each position and the name of the employee filling each job. _____

94(9)6ii	A written job description.	_____
9.4(g)6iii	Description of the training given to personnel.	_____
9.4(g)6iv	Documentation of actual training.	_____
9.4(g)7	Training records are <u>NOT</u> kept.	_____
9.4(g)8	Semi-annual drills, involving all employees and local authorities are <u>NOT</u> conducted.	_____

AND,

9.4(g) 8i Generator FAILED to petition the Department for an exemption from the drill requirement.

OR

9.4(g)8ii Generator FAILED to petition the Department for an exemption excluding local officials. _____

COMMENTS

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SECTION 12.PREPAREDNESS AND PREVENTION

IS THE FACILITY IN COMPLIANCE WITH THE
PREPAREDNESS & PREVENTION REGULATIONS?

YES NO

_____ ✓

IF NO, CHECK THE ITEMS OF NON COMPLIANCE.

9.6(b) Facility FAILS to have:

9.6(b)1 Communications or alarm system. _____

9.6(b)2 A telephone or device to summon
emergency assistance. _____

9.6(b)3 Portable emergency equipment. _____

9.6(b)4 Adequate Water supply. _____

9.6(c) Generator FAILED to test and
maintain emergency equipment. _____

9.6(f) Generator FAILED to:

9.6(f)1 Familiarize Police, fire depart-
ments, and emergency response
teams with the layout of the
facility, & hazardous waste handled. ✓ _____

9.6(f)2 Have an agreement designating
primary emergency authority to a
specific police and fire department
where more than one Police and fire
department are involved. _____

9.6(f)3 Make agreements with emergency
response contractors, and
equipment supplier. _____

9.6(f)4 Make arrangements to familiarize
local hospitals with the properties
of hazardous waste handled at the
facility and the types of injuries
result from fires, explosions,
or discharges at the facility. _____

9.6(f)5 Make arrangements with local fire
departments to inspect the
facility on a regular basis with
at least two (2) inspections
annually. _____

9.6(f)6

Document when authorities
identified in (f)1 through 5
above declined to enter into
such arrangements.

COMMENTS:

SECTION 13.WASTE WATER TREATMENT PLANT SLUDGE

FACILITY _____

EPA ID. No. _____ FILE No. _____

DOES THE FACILITY OPERATE A SLUDGE DRYING UNIT? _____

IF YES, OBTAIN THE FOLLOWING INFORMATION:

1. "WASTE WATER TREATMENT UNIT" QUALIFICATION PER
7:14A-4.3

Is the drying unit part of a waste water treatment facility which is subject to regulation under sections 402 or 307(b) of the federal Clean Water Act? _____

Note: In order to be considered "part of" the facility, the dryer need not be physically connected to the W.W.T. Facility, but must be located at the same site.

Describe the relationship between the dryer and the W.W.T. Facility.

Describe how the sludge is moved from the W.W.T. Facility to the dryer.

Does the drying unit treat a sludge which is generated on site by the wastewater treatment facility? _____

Is the sludge to be treated a regulated hazardous waste as defined at N.J.A.C. 7:26-8? _____

If yes, what is the waste classification code? _____

Does the drying unit meet the definition of a "tank" at N.J.A.C. 7:14A-4.3? _____

Note: "Tank" means a stationary device designed to contain an accumulation of hazardous waste and constructed of non-earthen materials which provide the structural strength to totally contain the waste. Dryers that are integrally equipped with feed or discharge hoppers for treatment of sludge in bulk satisfy the definition of "tank". Others not so designed may still be considered tanks on a case-by-case basis.

Provide a physical description of the drying unit.

2. PRIMARY PURPOSE RESTRICTION

Is the primary purpose of the dryer to dehydrate sludge, AND NOT to destroy sludge in order to produce an ash residue. _____

3. THERMAL INPUT LIMITATION

What is the dryer's maximum volume of sludge that the drying unit can hold? _____

What is the heating capacity of the drying unit in kilowatts or BTU/minute? _____

What is the maximum drying time? _____

What is unit weight of the sludge (lbs/cuft)? _____

THIS INFORMATION SHOULD BE SUBMITTED BY THE INSPECTOR TO BHWE FOR A PERMIT EXEMPTION DETERMINATION.

COMMENTS:

add additional pages as needed

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. General Information

Facility Name: TRITECH SERVICESU.S. EPA ID#: NJD 063144109 SIC Code: _____Street: FOUR CORPORATE PLACECity: PISCATAWAY State: NJ Zip: 08854Telephone #: (908) 878-6402 Telefax #: (908) 878-6597Inspection Date: 8-2-93 Time: 10:00 AM

	<u>Name</u>	<u>Agency/Title</u>	<u>Telephone #</u>
Inspectors:	<u>DOUGLAS GREENFIELD</u>	<u>NJDEPE</u>	<u>(609) 584-4200</u>

Facility Reps*:	<u>GLENN BONETTI</u>	<u>MTEE SUPERVISOR</u>	<u>(908) 878-6578</u>
	<u>JOHN DeROSE</u>	<u>V.P. CORP. SERVICES</u>	<u>(908) 878-6402</u>

* - Primary Environmental Contacts

See Appendix B to determine which of the following LDR waste categories the facility manages:

	<u>Generate</u>	<u>Transport</u>	<u>Treat</u>	<u>Store</u>	<u>Dispose</u>
F001-F005	_____	_____	_____	_____	_____
F020-F023 & F026-F028	_____	_____	_____	_____	_____
California List	_____	_____	_____	_____	_____
First Third	_____	_____	_____	_____	_____
Second Third	_____	_____	_____	_____	_____
Third Third	<u>✓</u>	_____	_____	_____	_____

INSPECTION SUMMARY

Processes that Generate LDR Wastes:

Excess water base ink from presses (D005)
Blanket Wash which is used to clean presses when
changing inks (D001)

LDR Waste Management:

Facility send certifications and notifications with
each shipment but did not have copies of the
notifications for 6 of the 9 shipments.

Summary of Potential LDR Violations:

Send ban notifications for the following manifest
were not on site.

NJA 0783745	- 6-7-91
NJA 0784094	3-24-92
NJA 1402002	3-25-92
NJA 1552982	2-11-93
NJA 1552983	2-11-93
NJA 1552984	2-11-93

Inspector Name and Title: DOUGLAS GREENFIELD, PRIN. ENV. ENG.

Signature: Douglas Greenfield

RCRA LAND DISPOSAL RESTRICTIONS INSPECTION

I. Waste Code Determination

1. Have all wastes been correctly identified for purposes of compliance with 40 CFR Part 268?

Yes ☒ No ☐

If no, list below:

Assigned Classification

Correct Classification

Comments: _____

2. Have both the listed and characteristic waste code been assigned, where a listed waste exhibits a characteristic? [40 CFR 268.9(a)]

Yes ☐ No ☐ NA ☒

Comments: _____

3. Has multi-source leachate been assigned the F039 waste code [40 CFR 261.31]?

Yes ☐ No ☐ NA ☒

If yes, was single-source leachate combined to form multi-source leachate [55 FR22623]?

Yes ☐ No ☐

Comments: _____

II. GENERATOR REQUIREMENTS

A. Treatability Group/Treatment Standard Identification

1. F001-F005 Spent Solvent Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each F-solvent?

Yes ☐ No ☐ NA ☒

If No, list below:

Waste Code

Assigned Classification

Correct Classification

Comments: _____

* < 1% by weight total organic carbon (TOC), < 1% by weight total F001-F005 solvent constituents listed in 40 C.F.R. Table CCWE [40 C.F.R. 268.2(f)(1)]

2. F020-F023 and F026-F028 Dioxin Wastes: Does the generator correctly determine the appropriate treatability group/treatment standard (* wastewater vs. non-wastewater) for each dioxin waste?

Yes _____ No _____ NA ☒

If no, list below:

Waste Code	Assigned Classification	Correct Classification
_____	_____	_____
_____	_____	_____
_____	_____	_____

Comments: _____

* < 1% TOC by weight and < 1% total suspended solids (TSS) by weight [40 C.F.R. 268.2(f)]

3. First, Second, and Third Third Wastes:

- a. Does the generator correctly determine the appropriate treatability group/treatment standard for each waste (i.e. subcategory and * wastewater vs. non-wastewater)?

Yes ☒ No _____ NA _____

If no, list below:

Waste Code	Assigned Subcategory	Correct Subcategory	Assigned wastewater vs. nonwastewater designation	Correct wastewater vs. nonwastewater designation
_____	_____	_____	_____	_____
_____	_____	_____	_____	_____

* < 1% TOC by weight and < 1% TSS with the following exceptions: K011, K013, and K014 wastewaters - less than 5% by weight TOC and less than 1% by weight TSS; K103 and K104 wastewaters - less than 4% by weight TOC and less than 1% by weight TSS. [40 C.F.R. 268.2(f)(2) and (3)]

Comments: _____

- b. Do the assigned treatment standards for listed wastes cover constituents that may cause the waste to exhibit any characteristics? [40 CFR 268.9(b)]

Yes _____ No _____ NA ☒

- c. Does the generator specify alternative treatment standards for lab packs?

Yes _____ No _____ NA ☒

GENERATOR

If yes, do lab packs only contain the following wastes* ? [40 CFR 268.42(c)(2)]

_____ Organometallics: 40 Part 268, Appendix IV constituents
 _____ Organics: 40 Part 268, Appendix V constituents

* Unregulated wastes and hazardous wastes which meet treatment standards may be commingled in the appropriate Appendix IV and V lab pack. [55 FR 22629]

d. Does the generator specify alternative treatment standards for F039 multi-source leachate?

Yes _____ No _____ NA ☒

4. California List Wastes: Has the generator correctly identified the treatability group and treatment standard/prohibition level for the following wastes [55 FR 22675] ?

a. Liquid hazardous wastes containing PCB's \geq 50 ppm

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ 50 to 500 ppm PCB's

_____ \geq 500 ppm PCB's

b. Listed or characteristic wastes containing \geq 1,000 mg/l (liquids) or mg/kg (non-liquids) HOC's, which are not listed or characterized by the HOC content.

Yes _____ No _____ NA ☒

If yes, check the appropriate treatability group:

_____ Dilute HOC wastewater (1,000 mg/l-10,000mg/l HOCs)

_____ All other HOC's greater than or equal to the prohibition level of 1,000 mg/l (liquids) or mg/kg (non liquids)

c. Liquid hazardous wastes that exhibit a characteristic and also contain \geq 134 mg/l nickel and/or \geq 130 mg/l thallium.

Yes _____ No _____ NA ☒

5. Treatment standards expressed as required technologies: Has the generator specified an alternative method to that required in 40 CFR 268.42?

Yes _____ No _____ NA ☒

If yes, list the waste code, the technology specified in 40 CFR 268.42, the alternative method and documentation of approval [40 CFR 268.42(b)].

Waste Code	Required Technology	Alternative Method	Approval
_____	_____	_____	_____
_____	_____	_____	_____

Comments: _____

6. Does the generator mix restricted wastes with different treatment standards for a constituent of concern?

Yes _____ No ☒

If yes, did the generator select the most stringent treatment standards?
[40 CFR 268.41(b) and 268.43(b)]

Yes _____ No _____

Comments: _____

B. Waste Analysis

1. Does the generator determine whether restricted wastes exceed treatment standards/prohibition levels at the point of generation? [268.7(a)]

Yes ☒ No _____

If no, does the generator ship all restricted wastes as not meeting treatment standards?

Yes _____ No _____

Comments: _____

2. Which of the following analytical methods does the generator employ?

- a. Knowledge of waste:

Yes ☒ No _____

If yes, list the wastes for which applied knowledge was used and describe the basis of determination. Attach documentation. [40 CFR 268.7(a)(5)]

- b. TCLP: Are wastes with treatment standards specified in 40 CFR 268.41 analyzed using TCLP? (BDAT=stabilization/immobilization technology) Examples: D004-D011, and F001-F009, etc.

Yes _____ No ☒ NA _____

If yes, list the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- c. Total constituent analysis: Are wastes with treatment standards specified in 268.43 analyzed using total constituent analysis? (BDAT=destruction/removal technology) Examples: D001-D003, majority of P and U wastes, etc.

Yes _____ No _____ NA ☒

If yes, list the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results [40 CFR 268.7(a)(5)].

- d. PFLT* : Was PFLT used to determine if California List constituents were contained in *liquid* hazardous waste?

Yes _____ No _____ NA ☒ *ALL LIQUID WASTE*

* PFLT = Paint Filter Liquids Test [Test Method 9095, EPA Publication No. SW-846]

If yes, list the wastes for which PFLT was used and provide the date of last test, the frequency of testing, and note any problems. Attach sample of typical test results. [40 C.F.R. 268.7(a)(5)]

3. Does the generator treat restricted wastes in < 90 day tanks or containers regulated under 40 CFR 262.34? (Examples: elementary neutralization, etc)

Yes _____ No ☒ (If No, go to 4)

Does the generator treat the wastes to meet appropriate treatment standards/prohibition levels?

Yes _____ No _____

If yes, has the generator prepared a waste analysis plan detailing the frequency of testing to be conducted? [40 CFR 268.7(a)(4)]

Yes _____ No _____ (If No, go to 4)

Does the plan fulfill the following? [40 CFR 268.7(a)(4)(i)]

_____ Based on a detailed chemical and physical analysis of a representative sample.

_____ Contains information necessary to treat the wastes in accordance with 40 CFR Part 268 requirements.

Has the plan been filed with the Regional Administrator (Receipt required for verification)? [40 CFR 268.7(a)(4)(ii)]

Yes _____ No _____

Comments: _____

4. Dilution Prohibition [40 CFR 268.3]:

- a. Does the generator mix prohibited* wastes with different treatment standards?

Yes _____ No ☒ (If No, go to b)

List the wastes: _____

Are the wastes amenable to the same type of treatment? [55 FR 22666]

Yes _____ No _____

* Prohibited wastes must be treated to established treatment standard prior to land disposal.

Comments: _____

- b. Does the generator dilute prohibited wastes to meet treatment standard criteria, or render them non-hazardous? [55 FR 22665-22666]

Yes _____ No ☒ (If No, go to c)

Check appropriate category:

_____ Dilutes to meet treatment standards

_____ Dilutes to render waste non-hazardous

Do the wastes fall into the following categories? [40 CFR 268.3(b)]

_____ Managed in treatment systems regulated under the Clean Water Act

_____ Non-Toxic* characteristic wastes

_____ Treatment standard specified in 40 CFR 268.41 or 268.43

* Non-toxic = D001 (except high TOC nonwastewaters), D002, and D003 (except cyanides and sulfides). [55 FR 22666]

If the wastes do not fall into the above categories, briefly describe the conditions under which they were diluted:

- c. Based on an assessment of points a. and b. and any other relevant circumstances, does the generator dilute prohibited wastes as a substitute for adequate treatment? [40 CFR 268.3(a)]

Yes _____ No ☒

Comments: _____

5. F039 Multi-source leachate: Has the generator run an initial analysis for all constituents of concern in 40 CFR 268.41 and 268.43? [55 FR 22620]

Yes _____ No _____ NA ☒

C. Management

1. On-Site Management

- a. Are restricted wastes treated (other than in a RCRA exempt unit), stored for greater than 90 days, or disposed on site?

Yes _____ No ☒ (If yes, complete TSD Checklist)

Comments: _____

- b. If the generator treats characteristic wastes in systems regulated under the Clean Water Act, have the following been documented: the determination of restriction, how restricted wastes are managed, and why wastes discharged pursuant to a NJPDES permit are not prohibited (if applicable)? [55FR 22662]

Yes _____ No _____ NA ☒

- c. If the generator treats characteristic wastes in RCRA exempt units to render them non-hazardous, are the wastes managed as restricted until 40 CFR 268 treatment standards are met*? [40 CFR 268.9(d)]

Yes _____ No _____ NA ☒

- * This applies to both concentration based treatment standards specified in 40 CFR 268.41 and 268.43, and to some 40 C.F.R. 268.42 required methods which result in treatment below the characteristic level. See Appendix D.

2. Off Site Management: Waste Exceeds Treatment Standards

- a. Does the generator ship any waste that exceeds treatment standards/prohibition levels to an off-site treatment or storage facility?

Yes ☒ No _____ (If No, go to 3)

Does the generator provide a notification to the treatment or storage facility? [40 CFR 268.7(a)(1)]

Yes ☒ No _____ (If No, go to 3)

If the generator specifies alternative treatment standards for lab packs, is the certification required in 40 CFR 268.7(a)(7) or (8) included with the notification?

Yes _____ No _____ NA ☒

- b. Is a notification sent with each waste shipment?

Yes ☒ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e) [SQG only]* ?

Yes _____ No _____ (If No, go to 3)

- * Small quantity generator = generator of greater than or equal to 100 kg/month but less than 1,000 kg/month hazardous waste, or less than 1 kg/month of acutely hazardous waste. (NJ criteria = <100 kg/month of hazardous waste or <1 kg/month of acutely hazardous waste)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

Waste Code	Subsequent Handler	Waste Code	Subsequent Handler
_____	_____	_____	_____

Did the SQG provide a notification to the receiving facility with the first waste shipment subject to the tolling agreement [40 CFR 268.7(a)(9)]?

Yes _____ No _____

3. Off-Site Management: Waste Meets Treatment Standards

- a. Does the generator ship waste that meets treatment standards/prohibition levels to an off-site disposal facility?

Yes _____ No ☒ (If No, go to 4)

Identify waste code(s) and off-site disposal facilities:

<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____
_____	_____

Note: Include documentation supporting the generator's determination that the waste meets applicable treatment standards/prohibition levels.

Does the generator provide a notification and certification to the disposal facility? [40 CFR 268.7(a)(2)(i) and 268.7(a)(2)(ii)]

Yes _____ No _____ (If No, go to D)

- b. Are a notification and certification sent with each waste shipment?

Yes _____ No _____

If no, is the waste subject to a tolling agreement pursuant to 262.20(e)? (SQG only)

Yes _____ No _____ (If No, go to c)

List waste codes and subsequent handler with whom a contractual tolling agreement is held.

<u>Waste Code</u>	<u>Subsequent Handler</u>	<u>Waste Code</u>	<u>Subsequent Handler</u>
_____	_____	_____	_____

Did the SQG provide a notification and certification to the receiving facility with the first waste shipment subject to the tolling agreement? [40 CFR 268.7(a)(9)]

Yes _____ No _____

- c. Are characteristic wastes which have been rendered non-hazardous (in a RCRA exempt unit) shipped to a Subtitle D facility?

Yes _____ No _____ NA _____ (If No or NA, go to 4)

Complete the following table:

<u>Waste Code</u>	<u>Receiving Facility</u>	<u>Waste Code</u>	<u>Receiving Facility</u>
_____	_____	_____	_____

GENERATOR

Are a notification and certification for each shipment sent to the Regional Administrator or authorized State? [40 CFR 268.9(d)(1) and 268.7(b)(5)]

Yes _____ No _____

4. Records Retention

Does the generator retain on site copies of all notifications, certifications, and other relevant documents for a period of 5 years? [40 CFR 268.7(a)(6)]

Yes _____ No ☒

Are copies of relevant tolling agreements, along with the LDR notification and/or certification, kept on site for at least 3 years after expiration or termination of the agreement? [40 CFR 268.9]

Yes _____ No _____ NA ☒

Do LDR documents reflect proper management of wastes previously covered under case by case extensions?

Yes _____ No _____ NA ☒

Comments: _____

D. Treatment Using RCRA 40 CFR Parts 264 and 265 Exempt Units or Processes

1. Are restricted wastes treated in RCRA exempt units (distillation units, wastewater treatment tanks, elementary neutralization, etc.)?

Yes _____ No ☒ (If No, do not complete this section)

List types of waste treatment units and processes:

<u>Waste Code</u>	<u>Type of Treatment</u>	<u>Treatment units and processes</u>
_____	_____	_____
_____	_____	_____
_____	_____	_____

2. Are treatment residuals generated from these units?

Yes _____ No _____

Comments: _____

3. Are residuals further treated, stored for greater than 90 days, or disposed on site?

Yes _____ No _____ NA _____

(If yes, the TSD checklist must be completed)

E. Additional Comments, Concerns, or Issues not addressed in the Checklist:

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Waste Minimization Checklist

GENERATOR CHECKLIST =====

MANIFEST

GENERAL 262.20

YES NO N/A

Does the generator, offer for transportation, hazardous waste for off-site treatment/disposal? If yes, proceed to next question. If no, proceed to 264.75/265.75.

☒ ☐ ☐

262.23

Does the generator sign the manifest certification which states:

☒ ☐ ☐

" If I am a large quantity generator, I have a program in place to reduce the volume and toxicity of the waste generated to the degree I have determined to be economically practical and that I have selected the practical method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford."

Does the generator have a written Waste Minimization Plan?

☐ ☒ ☐

If no, is the generator able to describe his plan orally.

☒ ☐ ☐

COMMENTS:

(Explain in this space the areas that visually show evidence that a program is in place and is being implemented)

Is in the process of getting permission to return water base ^{waste} ink which is hazardous (D005). See letter attached.

ANNUAL/BIENNIAL REPORT

262.41

YES NO N/A

- Has the generator submitted Annual (AR) or Biennial reports (BER) to the appropriate regulatory agency?

☒ ☐ ☐

The inspector should review these reports prior to the inspection (see above), and should try to verify the information in the report during his/her site inspection. The following questions should be addressed during the inspection.

262.56(a)(5)

Does the BER or AR include the efforts undertaken during the year to reduce the volume of toxicity of the wastes generated?

☐ ☐ ☒

Does the BER or AR include a description of the changes in volume and toxicity of the wastes actually achieved during the year in comparison to previous years?

☐ ☐ ☒

Do these efforts match the information contained in the generator's written or verbally described waste minimization program.

☐ ☐ ☒

Is the BER or AR certification signed by the generator or authorized representatives?

☒ ☐ ☐

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200



NOTICE OF VIOLATION

ID NO. NJD 063144 109 DATE AUGUST 2, 1993
NAME OF FACILITY TRITECH SERVICES
LOCATION OF FACILITY 4 CORPORATE PL., PISCATAWAY, MIDDLESEX
NAME OF OPERATOR GLENN BONETTI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION
NJAC 7:26-9.4(d)4 Failure of facility owner or
operator to comply with any of the
requirements for management of containers
SPECIFICALLY (d)4v
NJAC 7:26-9.4(d)5 Failure of facility owner or
operator to perform daily inspection of
each area where containers are stored.

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Rem A. Bonetti
Facility Receipt of Copy Only

Douglas Greenfield
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200

Let's protect our earth



NOTICE OF VIOLATION

ID NO. NJD 0623144109 DATE AUGUST 2, 1993
NAME OF FACILITY TRITECH SERVICES
LOCATION OF FACILITY 4 CORPORATE PL., PISCATAWAY, MIDDLESEX
NAME OF OPERATOR GLENN BONETTI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

N.J.A.C. 7:26-9.4(g) Failure of facility owner or
operator to provide required classroom
or on-the-job training for facility personnel
N.J.A.C. 7:26-9.6(k) Failure of facility owner or
operator to maintain sufficient aisle space
for unobstructed movement of personnel
or equipment in an emergency

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Glenn Bonetti
Facility Receipt of Copy Only

Douglas Greenfield
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection
Division of Hazardous Waste Management
Central Bureau of Field Operations
CN 407, Trenton, N.J. 08625-0407
(609) 584-4100 4202



NOTICE OF VIOLATION

ID NO. NJD063144109 DATE AUGUST 2, 1993
NAME OF FACILITY TRITECH SERVICES
LOCATION OF FACILITY 4 CORPORATE PL., PISCATAWAY, MIDDLESEX
NAME OF OPERATOR GLENN BONETTI Glenn Bonetti

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder and/or the Spill Compensation and Control Act, (N.J.S.A. 58:10-23.11 et seq.) and Regulations (N.J.A.C. 7:1E-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

NJAC 7:26-9.7(a) Failure of facility owner or
operator to have contingency plan designed
to minimize hazards to human
health and environment.

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Douglas Greenfield
Investigator, Division of Hazardous Waste Management
Department of Environmental Protection

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200



NOTICE OF VIOLATION

ID NO. NSD 063144109 DATE AUGUST 2, 1993
NAME OF FACILITY TRITECH SERVICES
LOCATION OF FACILITY 4 CORPORATE PL., PISCATAWAY, MIDDLESEX
NAME OF OPERATOR GLENN BONETTI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

NIAC 7:26-9.12(f) Failure of facility owner or
operator to make required arrangements
with police or fire departments, emergency
response contractors, equipment suppliers,
or local hospitals or to document
any such authority's refusal of
such arrangements

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Glenn Bonetti
Facility Receipt of Copy Only

Douglas Greenfield
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200



NOTICE OF VIOLATION

ID NO. WD 063144109 DATE AUGUST 2, 1993
NAME OF FACILITY TRITECH SERVICES
LOCATION OF FACILITY 4 CORPORATE PL., PISCATAWAY, MIDDLESEX
NAME OF OPERATOR GLENN BONETTI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

N.J.A.C. 7:26-7.4(h) Failure of generator to comply with
reporting requirements.
N.J.A.C. 7:26-9.3(a) 2.3 Failure of generator to clearly
mark containers with date when accumulation
period begins or to make marks visible for
inspection.

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Glenn Bonetti
Facility Receipt of Copy Only

Douglas Greenfield
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy

New Jersey Department of Environmental Protection and Energy
Division of Facility Wide Enforcement
Central Bureau of Water & Hazardous Waste Enforcement
CN 407, Trenton, N.J. 08625-0407
(609) 584-4200

Let's protect our earth



NOTICE OF VIOLATION

ID NO. NJD 063144109

DATE AUGUST 2, 1993

NAME OF FACILITY TRITECH SERVICES

LOCATION OF FACILITY 4 CORPORATE PL, PISCATAWAY, MIDDLESEX

NAME OF OPERATOR GLENN BONETTI

You are hereby NOTIFIED that during my inspection of your facility on the above date, the following alleged violation(s) of the Solid Waste Management Act, (N.J.S.A. 13:1E-1 et seq.) and Regulations (N.J.A.C. 7:26-1 et seq.) promulgated thereunder were observed. These violation(s) have been recorded as part of the permanent enforcement history of your facility.

DESCRIPTION OF VIOLATION

NIAC 7:26-9.3(d) 2 Failure of generator accumulating
hazardous waste on-site without a permit
to place waste in containers meeting
standards of NIAC 7:26-7.2 or to appropriately
manage containers

NIAC 7:26-9.3(d) 4 Failure of generator to mark
containers with the words "HAZARDOUS
WASTE"

Remedial action to correct these violations must be initiated immediately and be completed by

SEPTEMBER 1, 1993. Within fifteen (15) days of receipt of this Notice of Violation, you shall submit in writing, to the investigator issuing this notice at the above address, the corrective measures you have taken to attain compliance. The issuance of this document serves as notice to you that a violation has occurred and does not preclude the State of New Jersey, or any of its agencies from initiating further administrative or legal action, or from assessing penalties, with respect to this or other violations. Violations of these regulations are punishable by penalties of \$50,000 per violation.

Glenn Bonetti
Facility Receipt of Copy Only

Douglas Greenfield
Investigator, Division of Facility Wide Enforcement
Department of Environmental Protection & Energy



State of New Jersey
Department of Environmental Protection and Energy
Division of Solid Waste Management

CN 414
Trenton, NJ 08625-0414
Tel. # 609-530-8591
Fax. # 609-530-8899

Scott A. Weiner
Commissioner

Steven Gabel
Director

AUG 03 1992

Mr. David B. Hallman
National Accounts Manager
Superior Printing Ink Co., Inc.
70 Bethune Street
New York, NY 10014-1768

Dear Mr. Hallman:

This correspondence is in reply to your letter of June 10, 1992 concerning the recycling non-hazardous used inks from your customers in New Jersey. I appreciated the opportunity to meet with you and Lisa De Rosa earlier in June to discuss this issue and I will reaffirm this office's support for your efforts to recycle non-hazardous used inks. The costs for disposal of used inks can be high and recycling/reuse of used inks, as opposed to disposal, is clearly desirable. Your company's efforts to reuse its products returned from customers, which you have estimated to be up to 200,000 pounds per year, is supported by the Solid Waste Policy Guidelines issued in 1991 in response to the Governor's Emergency Solid Waste Assessment Task Force Final Report and Recommendations, of which I am enclosing a copy for your information.

The Bureau of Medical Waste and Residuals Planning has reviewed the proposed ink recycling plan submitted with your June 10, 1992 letter. According to your proposal, Superior Printing Ink Co., Inc. (Superior) will provide accumulation containers to its printer customers to collect fountain, excess and off-shade ink originally supplied by Superior. Superior will pick up these containers and return them to its manufacturing plants located in Maple Shade, Newark or New York. The used inks will be filtered to remove physical contaminants, tested and reformulated to return them to standard specifications. ~~The~~ reformulated inks will either be packaged and sold or blended with virgin inks in the manufacturing process.

It is noted that Superior has conducted testing of both new and used ink in accordance with USEPA analytical procedures. The analytical data reportedly indicates that the ink is not a hazardous waste. Further, the material safety data sheet submitted as well as the generic formula for the inks in question indicate that the inks are non-hazardous. This is a promising indication of the feasibility for recycling non-hazardous used inks. The strict avoidance of hazardous additives to these inks as advised by Superior, allows printers generating used ink to qualify for a solid waste recycling exemption as specified at N.J.A.C. 7:26-1.1(a)1.

The reuse program Superior has proposed is in accordance with existing solid waste and recycling regulations and at this time needs no further approval for recycling activity from the New Jersey Department of Environmental Protection and Energy as long as the inks being reused are non-hazardous and are not illegally disposed of. In addition, I request that Superior supply my office with an annual summary report describing the scope of the recycling program, including information on amounts of ink collected and recycled and the locations of the reprocessing. Of course, all transporting, recycling and reformulating must be done in accordance with any applicable federal, state or local requirements.

We are pleased Superior is adopting a policy promoting the recycling of its products for reuse. If my office can be of any further assistance, please feel free to direct any further questions concerning this recycling program to Ms. Sonya Rozansky of my staff at (609)530-8599.

Sincerely,



Robert M. Confer, Chief
Bureau of Medical Waste and
Residuals Planning

Enclosure

SR/pt
P/E-92-599

cc: Gary Sondermeyer
Sonya Rozansky
Guy Watson

PREPARING FOR RECYCLING

An Information Bulletin From Superior

Background

Excess ink has historically been a concern of every offset printer. The excess comes from two primary sources.

The first is specials run on jobs—whether Pantone numbers or special matches. The “additional can ordered so you won’t run out”, and the “larger quantity price break on the hope that the job will be repeated” has filled many ink rooms. Fortunately, computer matching programs and good ink technicians are able to address this issue.

The second source, fountain ink, is a more troublesome problem. Until now, a printer’s only choices were a labor intensive practice of emptying and re-introducing the fountain ink daily, or the more common practice of collecting it in a drum and disposing of it as waste.

Superior now offers a better alternative, the recycling of fountain ink. Superior will clean and refurbish your fountain ink, returning it to you repackaged and at original specifications.

However, Superior cannot reprocess hazardous waste. It is important that you understand what could make your ink unacceptable for Superior’s services and take steps now to be in a position to recycle your fountain inks and reduce your waste disposal.

The following information is summarized from a Florida fact sheet entitled “Waste Reduction Opportunities” that is written by the Waste Reduction Assistance Program (WRAP), Division of Waste Management, Florida Department of Environmental Regulations.

Toxic Characteristics

A waste is a hazardous waste due to its toxicity characteristics when any of 39 constituents included in the new Toxicity Characteristic (TC) Rule can be extracted from the waste in amounts equal to or above the regulatory level, using the Toxicity Characteristic Leaching Procedure (TCLP). The TCLP describes how the waste is to be sampled, prepared, extracted and analyzed.

This new TC rule replaces the old Extraction Procedure (EP) toxicity test that identified 8 metals and 6 pesticides. The TC rule adds 25 more chemicals to the EP list.

Several of the added chemicals are solvents which printers may find in inks and cleaning solutions that are used to clean presses. This means that waste ink, cleaning rags and even paper contaminated by these solvents could exhibit levels of solvent above the regulatory level when tested using TCLP. Although Superior no longer uses heavy metal pigments, some inks may also contain color that causes a waste to be above the TC level for metals (see page 4 for list of TC solvents and metals).

The regulatory level of a solvent varies based on its toxicity and other characteristics. If a solvent is uniformly mixed with the waste and does not evaporate, the volume of a solvent that would cause a specified quantity of waste to be considered toxic by TCLP can be calculated. For example, either a quart of a solvent with a 200 mg/l (parts per million) regulatory level, or a teaspoon of a solvent with a 0.5 mg/l level could make 500 pounds of waste toxic by TCLP.

The cost of a single complete TCLP analysis of a waste is around \$1,400. Analysis for only metals or only solvents can cost \$400 to \$600.

Expenses of this magnitude can deem recycling economically infeasible. It is important that steps be taken now so that you can avoid the need to have a TCLP analysis done on your fountain ink. The steps outlined on the following page will help you to determine if the solvents you are using would cause your ink to become a Toxic Characteristic Hazardous Waste and measures that can be implemented to eliminate or reduce the impact on your operation.

TC Exposure Evaluation

1. Examine the label and Material Safety Data Sheet (MSDS) of all inks and solvent cleaners that are used in your facility to see if they contain solvents included in the new TC Rule (see following page).
2. Check ink MSDS's to see if they contain listed hazardous metals (see following page).
3. Ask your suppliers for information about their products and the new TCLP.
4. If you find products with listed solvents or metals, look for and use other products that either do not contain these constituents or have them at much lower concentrations.
5. Use a parts washing service (e.g. Safety Kleen) to recycle and/or manage wash up solvents if they contain listed chemicals.
6. Don't accept "free samples" of solvents unless the vendor provides you with an MSDS that verifies it does not contain TC listed chemicals. Sometimes that free sample has a high disposal cost.

If you must use solvents that are covered by the TC Rule, look for ways to reduce the amount of hazardous waste produced by:

1. Keeping any paper or rags that are contaminated with the solvent separate from the rest of your solid waste.
2. Keeping the concentration of the solvents in mixtures below regulatory levels (page 4).
3. Segregating the solvent from other products, so it can be recycled on or off site.

Careful selection of the products you use in your business may help to eliminate the need to have TCLP analysis done. Careful planning can help reduce the amount of hazardous waste you have to deal with.

Remember, reduction and recycling are always better alternatives than disposal.

The compounds that are now covered by the new Toxicity Characteristic Rule and their regulatory level are listed below. If you do not find the chemical name on the list of ingredients, check for the CAS Number on the Material Safety Data Sheet (MSDS). If you do not find a CAS Number for each of the ingredients, you should also check the list of other chemical or trade names.

EPA HW No.		Regulatory Level mg/L	CAS No.	Other Chemical or Trade Names for TC Solvents
Solvents				
D018	Benzene	0.5	71-43-2	Algylen see Trichloroethylene
D019	Carbon Tetrachloride	0.5	56-23-5	Benzol see Benzene
D021	Chlorobenzene	100	108-90-7	Benzinoform see Carbon Tetrachloride
D022	Chloroform	6	67-66-3	Butanone see Methyl Ethyl Ketone
D023	o-Cresol	200	95-48-7	2-Butanone see Methyl Ethyl Ketone
D024	m-Cresol	200	108-39-4	Carbona see Carbon Tetrachloride
D025	p-Cresol	200	106-44-5	Carbon Tet see Carbon Tetrachloride
D026	Cresols	200		CC14 see Carbon Tetrachloride
D027	1,4-Dichlorobenzene	7.5	106-46-7	Chlorylene see Trichloroethylene
D028	1,2-Dichloroethane	0.5	107-06-2	Dow-Tri see Trichloroethylene
D029	1,1-Dichloroethylene	0.7	75-35-4	Ethynyl Trichloride see Trichloroethylene
D030	2,4-Dinitrotoluene	0.13	121-14-2	Ethyl Methyl Ketone see Methyl Ethyl Ketone
D032	Hexachlorobenzene	0.13	118-74-1	Ethylene Dichloride see 1,2-Dichloroethane
D034	Hexachloroethane	3	67-72-1	Halon 104 see Carbon Tetrachloride
D035	Methyl Ethyl Ketone	200	78-93-3	Landain see Trichloroethylene
D036	Nitrobenzene	2	98-95-3	Lethurin see Trichloroethylene
D038	Pyridine	5	110-86-1	Meetco see Methyl Ethyl Ketone
D039	Tetrachloroethylene	0.7	127-18-4	MEK see Methyl Ethyl Ketone
D040	Trichloroethylene	0.5	79-01-6	Methyl Acetone see Methyl Ethyl Ketone
				Monochlorobenzene see Chlorobenzene
				Necatorina see Carbon Tetrachloride
Metals				
D004	Arsenic	5	7440-38-2	Nialk see Trichloroethylene
D005	Barium	100	7440-39-3	PCE see Tetrachloroethylene
D006	Cadmium	1	7440-43-9	Perc see Tetrachloroethylene
D007	Chromium	5	7440-47-3	Perchloroethylene see Tetrachloroethylene
D008	Lead	5	7439-92-1	Perchloromethane see Carbon Tetrachloride
D009	Mercury	0.2	7439-97-6	Perm-A-Clor see Trichloroethylene
D010	Selenium	1	7782-49-2	Phenychloride see Chlorobenzene
D011	Silver	5	7440-22-4	TCE see Trichloroethylene
				Tetrachloromethane see Carbon Tetrachloride
				Tetraform see Carbon Tetrachloride
				Tri see Trichloroethylene
Pesticides and Other Organic Compounds				
D012	Endrin	0.02	72-20-8	Tri-Clene see Trichloroethylene
D013	Lindane	0.4	58-89-9	Trichloroethene see Trichloroethylene
D014	Methoxychlor	10	72-43-5	Trichloromethane see Chloroform
D015	Toxaphene	0.5	8001-35-2	Trielene see Trichloroethylene
D016	2,4-D	10	94-75-7	Triklene see Trichloroethylene
D017	2,4,5-TP (Silvex)	1	93-72-1	
D020	Chlordane	0.03	57-74-9	
D031	Heptaclor (and its Hydroxide)	0.008	76-44-8	
D033	Hexachloro-1,3-Butadiene	0.5	87-68-3	
D037	Pentachlorophenol	100	87-86-5	
D041	2,4,5-Trichlorophenol	400	95-95-4	
D042	2,4,6-Trichlorophenol	2	88-06-2	
D043	Vinyl Chloride	0.2	75-01-4	

CUSTOMER GUIDELINES

FOR

COLLECTING FOUNTAIN INKS FOR RECYCLING

There are two primary methods for accumulating your offset fountain inks for recycling, based on the rate at which you generate fountain waste. Fountains should be emptied before any wash-up solvent or detergent is used on the press, blankets, or cylinders to insure there is no contamination of the ink which could make it a hazardous material and therefore make it unfit for recycling. Use only ink additives specifically supplied by Superior.

Method A (for printers who normally accumulate less than 400 pounds per month. Only process colors will be accepted.

1. Fountain ink should be returned directly to one of the cans from which that ink type was originally taken.
2. Cans should be sprayed with anti-oxidant and immediately closed to minimize skinning.
3. Once the can is full, spray again, apply a skin paper (supplied by Superior), close and re-seal the can with tape.
4. Store the sealed cans for pick-up by Superior.

Method B (for larger volume printers)

1. Superior will provide you with color coded drums for the purpose of accumulating your offset fountain inks to be recycled. Each drum contains several inches (30 to 40 pounds) of a non-drying solution which will retard skinning in the container. Additionally, each drum is equipped with a protective cover system consisting of a wire mesh assembly to prevent the introduction of debris into the ink and a self-closing lid to minimize dust and spray powder contamination.
2. The customer is responsible for insuring that only designated fountain ink is placed in the drums. We have found this is most effectively accomplished by assigning one responsible individual per shift to make all additions to the accumulation drums.

3. The customer is also responsible for insuring color and system integrity in the four-color process accumulation drums. If you are using more than one process series, you must use a different set of accumulation drums for each set. Otherwise, Superior will be unable to return the drum to its original specifications.
4. A fifth spot color drum may be used to collect non-process inks. **Do not include the following items in this drum:**
 - a. Metallic inks
 - b. Fluorescent inks
 - c. Non-oxidizing inks (i.e. coldset, heatset, U.V. etc.)
 - d. Sublimation inks
5. Accumulation drums should be kept in an isolated area of the plant, away from main aisles, walkways, restrooms, and designated smoking areas. This decreases the probability of the drums being mistakenly used for trash.
6. Inks taken from press fountains should be taken immediately to the accumulation drums and dumped to minimize skinning. If this is not possible, interim containers should be treated with a non-skinning spray, and protected with skin paper and a lid on the interim container to prevent skinning prior to dumping into the accumulation drum.
7. Do not scrape any dried material from the protection screen into the accumulation drum.
8. When the oil in the drum reaches a level two inches below the protection screen, call Superior for shipping instructions and delivery of a replacement accumulation drum. Do not wait until you have a "set" of drums for pick-up. Waiting increases the possibility of excessive skin build-up and therefore decreases the yield of the recycling process.

Waste Ink Disposal Options

INTRODUCTION

It is evident that printing ink companies and their printer customers are under growing pressure to find legal and proper ways to dispose of their waste at reasonable cost and with assurance that future liabilities will be avoided. Not only are printing ink companies having difficulty with their own waste, but they are under mounting pressure from customers to take back waste ink as well.

Improper disposal can be literally disastrous to any company. Stories of large fines and even jail terms for improper waste handling are becoming commonplace and environmental liability insurance has become almost non-existent. Strict liability and "joint and several" liability under RCRA and Superfund laws hold the generator liable for his hazardous waste no matter who it was given to; and there are no time limits on that liability.

In order to help members deal with this difficult situation, NAPIM is pleased to disseminate information on waste disposal programs offered by six leading national waste management firms. These programs offer NAPIM members and their customers complete waste pick-up and disposal services along with guidance in dealing with existing waste disposal laws. Participants will be kept fully informed on what happens to their waste by the waste management companies of their choice.

DISPOSAL OPTIONS

In summary, there are three primary means of effectively handling hazardous and other industrial waste, including non-hazardous chemical waste such as printing ink. These are:

- Resource Recovery
- Incineration
- Stabilization

Resource Recovery: This disposal approach transforms hazardous (and other waste) with BTU value into a resource by using it as a supplemental fuel to power cement kilns. The high temperatures and long residence times insure virtually total destruction of organic ingredients. Inorganics become part of the cement or are captured by air pollution equipment, so there is no resultant ash. Waste streams must have at least 6,000 to 9,000 BTUs per pound and generally must be pumpable.

Incineration: This disposal approach incinerates the waste stream in EPA approved, specially designed high temperature incineration facilities. Waste streams do not have the limitations required for co-processing. Incineration produces ash which must be disposed of and generators must be assured that ash disposal produces no further liability under Superfund and that they are indemnified by the waste management company incinerating their waste.

Stabilization: In this approach, hazardous and other chemical wastes are solidified into a completely insoluble matrix, usually cement. The stabilized waste is then disposed of in an approved landfill in strict accordance with EPA rules. This has been a recognized and effective disposal method and is used by many large waste management companies. Recently, some waste experts have expressed concern for the future as landfills are exhausted and waste disposal rules become even more rigorous.

WASTE MANAGEMENT COMPANIES

NAPIM recognizes that there are many hazardous waste management firms which may be equipped to handle printing ink waste. The six companies named herein have all expressed a strong interest in providing waste disposal/management services to NAPIM members and their customers. These companies have all successfully handled printing ink waste from ink companies and/or printers including a number of NAPIM members. NAPIM believes that they are equipped to serve NAPIM members and their customers effectively.

Obviously, there are other qualified waste management companies capable of handling printing ink waste and some are undoubtedly already serving NAPIM members. Therefore, each NAPIM member company should make its own evaluation of the hazardous waste management programs proposed here and make its own decision whether to participate. NAPIM is attempting only to make known to its members potentially useful services and cannot be responsible for operation and management of the programs themselves.

MORE INFORMATION?

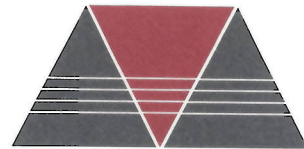
While NAPIM has not attempted to confirm its accuracy, information received from the six waste management companies is summarized in the following pages for the convenience of NAPIM members. Each of these companies has expressed an interest in handling printing ink waste from printers as well as printing ink companies. Members wishing to obtain more specific information and/or price quotations should contact the companies directly.

SUMMARY OF LISTED WASTE MANAGEMENT SERVICES

	ASHLAND	CADENCE	CHEM-MET	CHEM WASTE MGMT.	ENSA	RIEDEL	SAFETY-KLEEN	SYSTECH/VW&R
OPERATIONAL SINCE	1981	1975	1966	1975		1970	1968	1969
TSDR'S UNDER PERMIT	20+	24+	2	16	16	3	168 PERMITTED BRANCHES 12 RECYCLE CENTERS	7
TYPICAL QUANTITIES	DRUM/BULK(TOTE)	DRUM/BULK	DRUM/BULK LIQUID & SOLID	DRUM/BULK	DRUM	DRUM/BULK (TRUCK) (RAIL)	DRUM/JUMBO TANKCAR	DRUM/CONTAINER
WASTE CHARACTERIZATION SERVICES	YES	YES	YES	YES	YES	YES	YES	YES
MANIFESTING ASSISTANCE	YES	YES	YES	YES	YES	YES	YES	YES
CHEMICAL TREATMENT
ACID NEUTRALIZATION FIXATION/SOLIDIFICATION
LANDFILL
INCINERATION
SOLVENT RECOVERY
DEWATERING/FILTRATION
DEEP WELL INJECTION
FUEL BLENDING
CEMENT KILN
COMPLIANCE/LEGAL ADVISEMENT
COLLECTION PROGRAMS
WASTE MINIMIZATION PROGRAMS
EDUCATION/TRAINING
OTHER-SPECIALTY	1, 2 & 3	4	1 & 2		2 & 5	6 & 7	2 & 8	9

- 1 - ALL HAZARDOUS WASTES
- 2 - SMALL QUANTITY GENERATOR SERVICES
- 3 - TECHNICAL ADVISEMENT
- 4 - SOLVENT BASED HAZARDOUS WASTES - BOTH LIQUIDS & SOLIDS
- 5 - EXPERIENCE WITH PRINTER'S WASTE AND INK RECLAIMING
- 6 - THERMAL INCINERATION
- 7 - EMERGENCY RESPONSE SERVICES
- 8 - TRAINING PROGRAMS
- 9 - CHEMCARE PROGRAM - SYSTANK PROGRAM

February 03, 1994



TRITECH
A Merrill Lynch Company

George C. Meyer, PE, Chief
Hazardous Waste Compliance Branch
U.S. EPA Region II
Jacob K. Javits Federal Building
New York, New York 10078-0012

Kelly
U.S.E.P.A.

94 FEB -9 PM 2:25
HAZ. WASTE COMP. BR.

RE: Trittech Services
EPA ID #NJ063144109

Dear Mr. Meyer,

As per your letter dated January 14, 1994, I am writing to confirm that all of the LDR Notifications stated in your letter were acquired within a week after inspection and made available for review by the NJDEPE Inspector (See attached Manifests and LDR Notifications).

Currently, procedures are in place to ensure that all manifests and land disposal restriction notifications are on file and all pertinent information is included on the manifest.

If you have any questions or concerns regarding this matter, please contact me at your earliest convenience.

Sincerely Yours,

Glenn Bonetti
Tritech Safety/Environmental Coordinator
(908) 878-6578

GB:kgw

cc: Lauri Connors, esq.
Pat Cirillo, esq.
Mike DeNardo
John DeRose
KellyAnn Fen
James Newsome
John Nolan
Angelo Peluso



CYCLE CHEM

RECYCLING TREATMENT & DISPOSAL OF HAZARDOUS WASTE

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

This form meets generator restricted waste notification to Cycle Chem as required by 40 CFR Part 268.7

GENERATOR: Tritech Services

E.P.A. I.D. # NJ0063144109

MANIFEST NTA0783745

Is Waste Analysis available? Y ☐ N ☐ If Yes, attach a copy per 40 CFR Part 268.7(a)(i)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

Product Code: _____

☐ This shipment contains the EPA Hazardous Waste

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.41
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.091
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

☐ TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

Product Code: _____

☐ This shipment contains the EPA Hazardous Waste

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) ☐ PCB \geq 50 ppm
- 2) ☐ Halogenated organic carbon, (HOC's) \geq 1000 mg/l
- 3) ☐ Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
☐ Nickel (Ni) \geq 134 mg/l ☐ Thallium (Tl) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC $>$ 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

Example:	Product Code:	Code(s):	5 letter treatment code:	TREATMENT STANDARD - 40 CFR					applicable subcategory
	10012-15		D001	268.41(a)	268.42(a)	268.43(a)	268	ww	nww
Product Code:	340338-1K	Code(s):	D001	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Product Code:	340338-1K	Code(s):	D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product Code:	340338-1K	Code(s):	D001	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Product Code:	340338-1K	Code(s):	D001	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

(☒) I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

Product Codes: 340338-1K Codes(s): X722 Product Codes: _____ Codes(s): _____

Product Codes: LM018 Codes(s): X910 Product Codes: _____ Codes(s): _____

(☒) I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval.

* Signature: M. W. Wetters * Date: 06/02/91

* Print Name: MARIE WETTERS * Title: ASST. MGR.

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!

CN 028, Trenton, NJ 08625

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		Generator's US EPA ID No.		Manifest Document No.		Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Tritech Services 4 Corporate Place, Piscataway, New Jersey 08854 4. Generator's Phone:								A. State Manifest Document Number NJA 0783745							
5. Transporter 1 Company Name Direct Environmental, Inc. 7. Transporter 2 Company Name				8. US EPA ID Number NJ D982280851 8. US EPA ID Number				B. State Generator's ID Rama							
9. Designated Facility Name and Site Address Cycle Chem, Inc. 217 South First Street Elizabeth, New Jersey 07206				10. US EPA ID Number NJ D982280851				C. State Trans. ID NJDP 81103755 D. Transporter's Phone (201) 677-1800 E. State Trans. ID F. Transporter's Phone (G. State Facility's ID H. Facility's Phone (201) 955-5000							
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM								12. Containers No Type		Total Quantity		Unit Wt/Vol		Waste No.	
a.	Waste Oil, n.o.s. Combustible Liquid NA 1270 (X722)							XX3		CO/65		c X722		2	
b.	Waste Chemical Process Solid Non Det./Ext. BCRA Waste Material (X910)							Y79 DM		O45010		d Y79		10	
c.	RQ Waste Flammable Liquid, n.o.s. ORM-E TB 1993 (D039) (D034) (D035) (D001)							XX13 DM		CO/65				D039 D034 D035 D001	
d.															
J. Additional Descriptions for Materials Listed Above Waste Oils 80%, Water 20% Waste Ink 10% Waste Solvent 80%								K. Handling Codes for wastes listed above S.O.I S.O.V S.O.V							
15. Special Handling Instructions and Additional Information a). Product Code #: 340338-ON b). Product Code #: 340338-LM018 c). Product Code #: 340338-TX NUTECAL 63706 VIN: XS6LYR EMERGENCY RESPONSE PHONE: 6771200															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name Philip Santen								Signature [Signature]				Month Day Year 060291			
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year															
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name Signature Month Day Year															
19. Discrepancy Indication Space JA LIT Amount changed prior to arrival at cycle chem TB'S IMXIMX (AQ) bit - [unclear] HC No 0039 CT No 0034 WHMX 41108-560-5781															
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name Signature Month Day Year															



LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

This form meets generator restricted waste notification to Cycle Chem as required by 40 CFR Part 268.7.

GENERATOR: Tri-Tech Services

E.P.A. I.D. # NJD063144109

MANIFEST NJA 0784094

Is Waste Analysis available? Y ☐ N ☐ If Yes, attach a copy per 40 CFR Part 268.7(a)(i)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

Product Code: _____

☐ This shipment contains the EPA Hazardous Waste _____

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.41
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.091
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

☐ TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

Product Code: _____

☐ This shipment contains the EPA Hazardous Waste _____

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) ☐ PCB \geq 50 ppm
2) ☐ Halogenated organic carbon, (HOC's) \geq 1000 mg/l
3) ☐ Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
☐ Nickel (Ni) \geq 134 mg/l ☐ Thallium (TI) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC $>$ 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

Example:		TREATMENT STANDARD - 40 CFR										applicable subcategory
Product Code:	Code(s):	5 letter treatment code	268.41(a)	268.42(a)	268.43(a)	268	ww	nww				
10012-15	D001	FSUBS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>				Ignitable D001 Liquid with TOC $>$ 10%
340338-1K	D039		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				

(☒) I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

Product Codes: 340338-DW Codes(s): X722 Product Codes: _____ Codes(s): _____
Product Codes: _____ Codes(s): _____ Product Codes: _____ Codes(s): _____

(☒) I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval.

Initial RF

Signature: X Ralph Fiorillo

Date: X 3/24/92

Print Name: X RALPH FIORILLO

Title: X

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0090, Expires 2-30-91.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ D06314410984094		Manifest Document No. 1		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address Fritsch Services 4 Corporate Plaza, Piscataway, NJ 08854						A. State Manifest Document Number NJA 0784094			
4. Generator's Phone (908) 678-6537						B. State Generator's ID ONE			
5. Transporter 1 Company Name Direct Environmental Inc.						6. US EPA ID Number NJ D002200051			
7. Transporter 2 Company Name						C. State Trans. ID NJ D010375			
8. US EPA ID Number						D. Transporter's Phone (201) 677-1800			
9. Designated Facility Name and Site Address Cycle Chem Inc. 217 South First Street Elizabeth, NJ 07206						E. State Trans. ID			
10. US EPA ID Number NJ D002200046						F. Transporter's Phone ()			
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM						G. State Facility's ID			
12. Containers						H. Facility's Phone (908) 353-5800			
						13. Total Quantity			
						14. Unit Wt/Vol			
						Waste No.			
a. Waste Oil, n.o.s.						XX2			
X Combustible Liquid UN1270						XX1/10G X 7 2 3			
b. RQ Waste Flammable Liquid, n.o.s.						X 1 4			
X ORM-E UN1992 (D039)						XX1/750G D 0 3 9			
c.									
d.									
J. Additional Descriptions for Materials Listed Above						K. Handling Codes for Wastes Listed Above			
L. Waste Oils - 804						a. S 0 1			
a. Water - 204						c.			
L, I, T Waste Ink - 104						b.			
b. Waste Solvents - 204						d.			
15. Special Handling Instructions and Additional Information									
a) 340338-OW									
b) 340338-IX									
24Hr. Emergency Phone # (201)677-1800									
DEI Job # 910278 VIN # XR236N PO # 787 Real 16249									
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.									
Printed/Typed Name * BERNARD F. JUKILLO					Signature * [Signature]				
					Month Day Year 10/31/92				
17. Transporter 1 Acknowledgement of Receipt of Materials									
Printed/Typed Name * Philip Santen					Signature * [Signature]				
					Month Day Year 10/31/92				
18. Transporter 2 Acknowledgement of Receipt of Materials									
Printed/Typed Name					Signature				
					Month Day Year				
19. Discrepancy Indication Space									
3A) ADD T, ADD MACHINE AND LUBE TO WASTE OILS, ERG #27 11B) FLAMMABLE LIQUID UN1993 NOT ORM-E, UN1992. I B) ADD D001, D035 3 ADD (D001) (ERG #27) E NOT T, ADD (MECHANICAL OIL) TO WASTE SOLVENT 910									
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.									
Printed/Typed Name * JESSE N. [Signature]					Signature * [Signature]				
					Month Day Year 10/31/92				



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625



Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039. Expires 9-30-94.

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address Writect Services 4 Corporate Plaza, Piscataway, NJ 08854		6. US EPA ID Number 19 J 0 0 0 7 1 4 1 1 0 0 1 0 2 0 0 2		A. State Manifest Document Number NJA 1402002	
4. Generator's Phone (908) 879-6557		7. Transporter 1 Company Name Direct Environmental Inc.		B. State Generator's ID SAE	
5. Transporter 1 Company Name Direct Environmental Inc.		8. US EPA ID Number 19 J 0 0 0 2 2 0 0 0 0 0 1		C. State Trans. ID 19 J 0 0 0 2 2 0 0 0 0 0 1	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (201) 577-1800	
9. Designated Facility Name and Site Address Cycle Chem Inc. 217 South First Street Elizabeth, N.J. 07206		10. US EPA ID Number 19 J 0 0 0 2 2 0 0 0 0 0 1		E. State Trans. ID	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type		13. Total Quantity 14. Unit Wt/Vol Waste No.	
a. NO Waste Flammable Liquid, n.o.s. CR4-E UN1992 (D039)		b. 350		c. 10 12 19	
b.		c.		d.	
c.		d.		e.	
d.		e.		f.	
J. Additional Descriptions for Materials Listed Above L.I.T Waste Ink 104 a. Waste Solvents 204		K. Handling Codes for Wastes Listed Above a. S 0 1 b. c. d.		c.	
15. Special Handling Instructions and Additional Information Product Code 340338-TR DET Job # 918279 NJ Decal # 16249 PO # 787 24Hr. Emergency Phone # (201) 677-1800 VIN # YR236U					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.					
Printed/Typed Name Michael F. ...		Signature [Signature]		Month Day Year 10/11/93	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Paula ...		Signature [Signature]		Month Day Year 10/11/93	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space 11A) ADD FLAMMABLE LIQUID, UN1993, (D001), BE STORM-E (UN199) SAJE NOT T, ADD (MECHANICAL) TO WASTE SHIPMENT					
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name HELEN PAPPAS		Signature [Signature]		Month Day Year 10/11/93	



LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

This form meets generator restricted waste notification to Cycle Chem as required by 40 CFR 1

GENERATOR: Tritech Services

E.P.A. I.D. # NJ D063144109

MANIFEST NJAH02002

Is Waste Analysis available? Y N If Yes, attach a copy per 40 CFR Part 268.7(a)(i)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

Product Code:

 This shipment contains the EPA Hazardous Waste

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.11
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.091
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

 TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

Product Code:

 This shipment contains the EPA Hazardous Waste

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) PCB \geq 50 ppm 2) Halogenated organic carbon, (HOC's) \geq 1000 mg/l
- 3) Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
 Nickel (Ni) \geq 134 mg/l Thallium (Tl) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC $>$ 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

Example:		TREATMENT STANDARD - 40 CFR										applicable subcategory
Product Code	Code(s)	5 letter treatment code	268.41(a)	268.42(a)	268.43(a)	268	ww	nww				
3403381	D001	FSURS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ignitable D001 Liquid with TOC $>$ 10%
3403381	D039		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	nww code / no prod
Product Code:	Code(s):		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Product Code:	Code(s):		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Product Code:	Code(s):		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

(☒) I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

Product Codes: Codes(s): Product Codes: Codes(s):

Product Codes: Codes(s): Product Codes: Codes(s):

(☒) I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval. Initial

Signature: X Rafael Fiorillo Date: X 3/25/92

Print Name: X RAFAEL FIORILLO Title: X

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!

GENERATOR: TRITECH SERVICES

 E.P.A. I.D. # NJD063144109

 MANIFEST NJA1552982

 Is Waste Analysis available? Y N X If Yes, attach a copy per 40 CFR Part 268.7(a)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

 Product Code:
 This shipment contains the EPA Hazardous Waste

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.41
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.091
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

 TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

 Product Code:
 This shipment contains the EPA Hazardous Waste

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) PCB \geq 50 ppm 2) Halogenated organic carbon, (HOC's) \geq 1000 mg/l
- 3) Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
 Nickel (Ni) \geq 134 mg/l Thallium (TI) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC > 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

Example:		TREATMENT STANDARD - 40 CFR		5 letter treatment code		268.41(a)		268.42(a)		268.43(a)		268		ww		nww		Applicable subcategory
Product Code:	10012-15	Code(s):	D001		FSVBS	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>			Ignitable D001 Liquid with TOC > 10%
(b) Product Code:	343975-1K	Code(s):	D001			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			Ignitable D001 Liquid
(c) Product Code:	343975-1K	Code(s):	D001			<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			Ignitable D001 Liquid
Product Code:		Code(s):				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
Product Code:		Code(s):				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

 (✓) I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

- (a) Product Codes: 343975-1K01 X726 Codes(s): Product Codes: Codes(s):
- (d) Product Codes: 343975-1K-01 X726 Codes(s): Product Codes: Codes(s):

 (✓) I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

 I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval. Initial HP

Signature: Harry Otero Date: 2/11/93

Print Name: Harry DiFlorio Title: Production Manager

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

1993

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ 09042124109	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address RITECH SERVICES CORPORATE PARK 297 PISCATAWAY NJ 08854-6301				A. State Manifest Document Number NJA 1552982		
4. Generator's Phone (908) 978-6340				B. State Generator's ID NONE		
5. Transporter 1 Company Name CLEAN VENTURE, INC.		6. US EPA ID Number NJ 09042124109		C. State Trans. ID NJ09042124109		
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone (908) 442-4900		
9. Designated Facility Name and Site Address CYCLE CHEN INC. 217 SOUTH FIRST ST. ELIZABETH NJ 07206-0000		10. US EPA ID Number		E. State Trans. ID		
				F. Transporter's Phone ()		
				G. State Facility's ID		
				H. Facility's Phone (908) 355-5800		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM				12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol
a. WASTE PETROLEUM MIXTURE LIQUID NON HCA/NON DOT 1726				X10	XX550	1726
b. WASTE COMBUSTIBLE LIQUID, NOS COMBUSTIBLE LIQUID 1001				XX5	XX275	1001
c. WASTE COMBUSTIBLE LIQUID, NOS COMBUSTIBLE LIQUID 1001				XX1	XXX55	1001
d. WASTE PETROLEUM MIXTURE LIQUID NON HCA/NON DOT 1726				XX2	XXX50	1726
J. Additional Descriptions for Materials Listed Above L. T. Oil 100X L, I 1,2,4 Trimethylbenzene 14.5% - 12% Xylene (mixed isomers) 2.50% - 12% Cumene .5% Oil 1% (No Metals) 10%				K. Handling Codes for Wastes Listed Above a. SUI c. SUI b. SUI d. SUI		
15. Special Handling Instructions and Additional Information (b)(c) Material per drum is 195 lbs Napthol spirits 179 lbs super high flash naphtha fragrance 8 Oz. 10X A1343975-IX -01 A1343975-IX -02 A1343975-IX -03 A1343975-IX -04 A1343975-IX -05 A1343975-IX -06 A1343975-IX -07 A1343975-IX -08 A1343975-IX -09 A1343975-IX -10				EMERGENCY PHONE 908-442-4900 CLEAN VENTURE, INC. DECAL 4547 plate XL46ms W/D 010711		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.						
Printed/Typed Name HARRY D. FLORIO				Signature Harry D. Florio		Month Day Year 02/1/93
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name Richard R. Steedman				Signature Richard R. Steedman		Month Day Year 02/1/93
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name W. J. ...				Signature W. J. ...		Month Day Year 02/1/93
19. Discrepancy Indication Space 375022 10% NIT 2% 140/G						
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19. Printed/Typed Name WELDON PAPER						
Signature Weldon Paper				Month Day Year 02/1/93		

GENERATOR: TRITECH SERVICES

 E.P.A. I.D. # NJD063144109

 MANIFEST NJAL552983

 Is Waste Analysis available? Y N X If Yes, attach a copy per 40 CFR Part 268.7(a)(i)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

 Product Code:
 This shipment contains the EPA Hazardous Waste

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.41
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.081
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

 TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

 Product Code:
 This shipment contains the EPA Hazardous Waste

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) PCB \geq 50 ppm 2) Halogenated organic carbon, (HOC's) \geq 1000 mg/l
- 3) Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
 Nickel (Ni) \geq 134 mg/l Thallium (Tl) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

 Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC $>$ 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

		TREATMENT STANDARD - 40 CFR						applicable subcategory
		268.41(a)	268.42(a)	268.42(b)	268	ww	nww	
Example:	Product Code: 10012-JS Code(s): D001	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ignitable D001 Liquid with TOC $>$ 10%
(a)	Product Code: 343975-TK Code(s): D001	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Ignitable D001 Liquid
(b)	Product Code: 343975-MS021 Code(s): D005	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	TricPBarium
	Product Code: <u> </u> Code(s): <u> </u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
	Product Code: <u> </u> Code(s): <u> </u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

() I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

- (c) Product Codes: 343975-RW Codes(s): X900 Product Codes: Codes(s):
- (d) Product Codes: 343975-RW Codes(s): X900 Product Codes: Codes(s):

() I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

 I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval. Initial H

 Signature: Harry Duran

 Date: 7/11/93

 Print Name: Harry Duran

 Title: Production Manager

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!

In case of an emergency or spill immediately call the state the emergency occurred in and the N.J. Dept. of Environmental Protection. (609) 292-5560 (Day) (609) 292-7172 (Night)



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

1993

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039. Expires 9-30-94

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
3. Generator's Name and Mailing Address TRITECH SERVICES CORPORATE PARK 207 PISCATAWAY NJ 08854-6301		4. Generator's Phone (908) 478-6340		A. State Manifest Document Number NJA 1552983	
5. Transporter 1 Company Name CLEAN VENTURE, INC.		6. US EPA ID Number NJ 0000000000		B. State Generator's ID SAME	
7. Transporter 2 Company Name		8. US EPA ID Number		C. State Trans. ID NJ0000000000	
9. Designated Facility Name and Site Address CYCLE CHEN INC. 217 SOUTH FIRST ST. ELIZABETH NJ 07206-0000		10. US EPA ID Number NJ 0000000000		D. Transporter's Phone (908) 442-4900	
				E. State Trans. ID	
				F. Transporter's Phone ()	
				G. State Facility's ID	
				H. Facility's Phone (908) 333-8800	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM		12. Containers No. Type	13. Total Quantity	14. Unit Wt/Vol	15. Waste No.
a. HAZARDOUS WASTE SOLID NOS					
b. HAZARDOUS WASTE SOLID NOS					
c. HAZARDOUS WASTE SOLID NOS					
d. HAZARDOUS WASTE SOLID NOS					
e. HAZARDOUS WASTE SOLID NOS					
f. HAZARDOUS WASTE SOLID NOS					
g. HAZARDOUS WASTE SOLID NOS					
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dq. HAZARDOUS WASTE SOLID NOS					
dr. HAZARDOUS WASTE SOLID NOS					
ds. HAZARDOUS WASTE SOLID NOS					
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CYCLE CHEM

RECYCLING TREATMENT & DISPOSAL OF HAZARDOUS WASTE

LAND DISPOSAL NOTIFICATION AND CERTIFICATION FORM

This form meets generator restricted waste notification to Cycle Chem as required by 40 CFR Part 268.7.

GENERATOR: TRITECH SERVICES

E.P.A. I.D. # NJDO63144109

MANIFEST NJA1552984

Is Waste Analysis available? Y N X If Yes, attach a copy per 40 CFR Part 268.7(a)(i)(iv).

A. F001, F002, F003, F004, F005 SOLVENT RESTRICTIONS

Product Code:

 This shipment contains the EPA Hazardous Waste

This restricted waste category is banned from land disposal under 40 CFR 268.30 and is subject to one or more treatment standards under 40 CFR Subpart D. Complete the information below by circling the appropriate waste constituent and check the applicable notification statement below.

Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l	Constituent	Concentration Standard in Extract, mg/l
1. Acetone	0.59	10. Ethylbenzene	0.053	18. Pyridine	0.33
2. n-Butyl Alcohol	5.00	11. Ethyl ether	0.75	19. Tetrachloroethylene	0.05
3. Carbon Disulfide	4.81	12. Isobutanol	5.00	20. Toluene	0.33
4. Carbon Tetrachloride	0.96	13. Methanol	0.75	21. 1,1,1-Trichloroethane	0.41
5. Chlorobenzene	0.05	14. Methylene chloride	0.96	22. 1,1,2-Trichloro-1,2,2-Trifluoroethane	0.96
6. Cresols (and cresylic acid)	0.75	15. Methyl ethyl ketone	0.75	23. Trichloroethylene	0.081
7. Cyclohexanone	0.75	16. Methyl isobutyl ketone	0.33	24. Trichlorofluoromethane	0.96
8. 1,2-Dichlorobenzene	0.125	17. Nitrobenzene	0.125	25. Xylene	0.15
9. Ethyl acetate	0.75				

 TREATMENT STANDARD — 40 CFR (See Table 1) ☐ 268.41(a) ☐ 268.42(a) ☐ 268.43(a)

B. CALIFORNIA LIST NOTIFICATION

Product Code:

 This shipment contains the EPA Hazardous Waste

Additional notification is required under 40 CFR 268.32(j) to state specific characteristics for which land disposal is prohibited. If your waste contains any of these constituents or meets any of these properties, please check below.

- 1) PCB \geq 50 ppm 2) Halogenated organic carbon, (HOC's) \geq 1000 mg/l
- 3) Liquids or any free liquids associated with any solid or sludge, containing the following metals or compounds of these metals:
 Nickel (Ni) \geq 134 mg/l Thallium (Tl) \geq 130 mg/l

C. RESTRICTED WASTE NOTIFICATION

Certain waste streams have been restricted from land disposal effective May 8, 1990. Restricted wastes acceptable at Cycle Chem are listed in the attached Table 1. If your waste is classified as any of those listed in Table 1, write your product code(s); the waste code(s) and any applicable subcategories (e.g. Ignitable Liquids, D001, with TOC $>$ 10%); check the corresponding treatment standard from Table 1 as referenced by the 40 CFR 268.41, 268.42, or 268.43 designation, check if the waste is a waste water (ww) or non waste water (nww), and check the notification statement below. For wastes listed in 268.42, a 5 letter treatment code must be listed (see Table 1).

Example:		5 letter treatment code		TREATMENT STANDARD - 40 CFR					applicable subcategory	
Product Code:	Code(s):			268.41(a)	268.42(a)	268.43(a)	268	ww		
Product Code: <u>10012-15</u>	Code(s): <u>D001</u>	<u>FSUBS</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Ignitable D001 Liquid with TOC > 10%</u>
Product Code: <u>343975-1K</u>	Code(s): <u>D001</u>	<u>FSUBS</u>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<u>Ignitable D001 Liquid</u>
Product Code: <u> </u>	Code(s): <u> </u>	<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
Product Code: <u> </u>	Code(s): <u> </u>	<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>
Product Code: <u> </u>	Code(s): <u> </u>	<u> </u>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u> </u>

() I notify that I personally examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this notification that the waste does not comply with the treatment standards specified in 40 CFR 268, Subpart D, or RCRA Section 3004(d), and all applicable prohibitions set forth in appropriate regulatory treatment standards (to the appropriate treatment standard, if applicable) prior to land disposal.

D. NON/HAZARDOUS WASTE CERTIFICATION

If your waste does not fall into the categories listed above in Items A, B, or C, write in the Product Code(s) and the State Waste Code(s) and check the following notification statement.

(a) Product Codes: 343975-RW Codes(s): X900 Product Codes: Codes(s):

Product Codes: Codes(s): Product Codes: Codes(s):

() I notify that I have personally examined and am familiar with the waste through analysis and testing or through notification that the waste is not restricted as specified in 40 CFR 268, Subpart D and all applicable prohibitions set forth in 268.32 or RCRA 3004(d).

E. CHANGE VERIFICATION

I hereby authorize Cycle Chem to amend and/or correct any information on the LDR with the full understanding that if any amendment or correction is performed, I will be contacted as such to issue my approval. Initial

Signature: Henry O. DiPuccio

Date: 2/11/93

Print Name: Henry O. DiPuccio

Title: Production Manager

PLEASE INCLUDE THIS NOTIFICATION WITH ORIGINAL SIGNATURE WITH YOUR MANIFEST!



State of New Jersey
Department of Environmental Protection
Division of Hazardous Waste Management
Manifest Section
CN 028, Trenton, NJ 08625

Form Approved. OMB No. 2050-0039. Expires 9-30-94

Please type or print in block letters. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. NJ 08834-4301		Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.	
3. Generator's Name and Mailing Address TRITECH SERVICES CORPORATE PARK 287 PISCATAWAY NJ 08834-4301					A. State Manifest Document Number NJA 1552984		
4. Generator's Phone (908) 970-2540					B. State Generator's ID SAME		
5. Transporter 1 Company Name CLEAN VENTURE, INC.					6. US EPA ID Number NJ 08834-4301		
7. Transporter 2 Company Name					8. US EPA ID Number		
9. Designated Facility Name and Site Address CYCLE CHEM INC. 217 SOUTH FIRST ST. ELIZABETH NJ 07208-0000					10. US EPA ID Number		
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) HM					12. Containers No. Type		13. Total Quantity
a. WASTE CHEMICAL PROCESS LIQUIDS NON DOT/NON RCRA 1900					XX1		XXX30
b. Waste Combustible Liquid, n.o.s. Combustible Liquid 111993 (2001)							
c.							
d.							
J. Additional Descriptions for Materials Listed Above L 55-NPA See MSDS (Ethylene 100% Glycol 50-60% Diethylene Glycol 0-10% a. Water balance L 1 Xylene (Mixed Isomers) 2 50%-1% b. 1,2,3 Triethylbenzene 14.5%-12%					K. Handling Codes for Wastes Listed Above a. 5111 c.		
15. Special Handling Instructions and Additional Information (No Metals) Inks 10% Material Per drum is 195 lbs NAPHTHOL Spirits 179 lbs super high flash Naphtha, fragrance 8 oz ENG#27 ALCAL 45647 plate XL46ms W/O 01677L					EMERGENCY PHONE #908-442-4900 CleanVenture, Inc.		
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.							
Printed/Typed Name Harry Difuria				Signature Harry Difuria		Month Day Year 02/11/93	
17. Transporter 1 Acknowledgement of Receipt of Materials				Printed/Typed Name Richard Des Jardin		Signature Richard Des Jardin	
18. Transporter 2 Acknowledgement of Receipt of Materials				Printed/Typed Name		Signature	
19. Discrepancy Indication Space 11 B1 NPS DELIVERED 551 DOES NOT APPLY							
20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.				Printed/Typed Name LARRY J. SPAD		Signature LARRY J. SPAD	
						Month Day Year 02/11/93	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION II

JACOB K. JAVITS FEDERAL BUILDING

NEW YORK, NEW YORK 10278-0012

JAN 14 1994

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Glenn Bonetti
Maintenance Supervisor
Tritech Services
Piscataway, New Jersey 08854

Re: Tritech Services
EPA I.D. No. NJD063144109

Dear Mr. Bonetti:

This Notice of Violation is issued pursuant to Section 3008 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recover Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984 42 U.S.C. § § 6901, 6928.

Pursuant to HSWA, the U.S. Environmental Protection Agency (EPA) promulgated regulations on November 7, 1986, which prohibited the land disposal of restricted waste. 51 Fed. Reg. 40,572 (November 7, 1986). These regulations are published in 40 C.F.R. Part 268, and amend various sections of 40 C.F.R. Parts 260-265 and 270. They became effective on November 8, 1986.

The State of New Jersey is authorized by EPA to conduct a hazardous waste program under Section 3006 of RCRA, 42 U.S.C. § 6926. However, the authorized State program does not include provisions of HSWA, and regulations promulgated thereunder. EPA has the sole authority to implement and enforce regulations promulgated pursuant to HSWA, including the land disposal restrictions (LDR).

On August 02, 1993, a duly authorized representative of the New Jersey Department of Environmental Protection and Energy conducted an inspection of Tritech Services, Piscataway, New Jersey, pursuant to Section 3007 of RCRA, 42 U.S.C. § 6927. During this inspection, the inspector noted that:

1. 40 C.F.R. § 268.7(a)(7), which is one of the provisions of the LDR, has been violated. Section 268.7(a)(7) requires the following:

A generator must retain on-site a copy of all notices, certifications, demonstrations, waste analysis data, and other documentation produced pursuant to this section for at

least five years from the date that the waste that is the subject of such documentation was sent to on-site or off-site treatment, storage or disposal. The five year record retention period is automatically extended during the course of any unresolved enforcement action regarding the regulated activity or as requested by the Administrator.

At the time of the above referenced inspection, several manifest copies were found to be without the required LDR notifications and the facility failed to retain on-site a copy of all documentation concerning hazardous waste for at least five years. The specific violations as revealed by NJDEPE inspector are as follows:

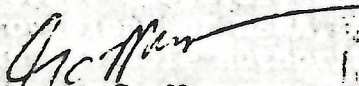
- LDR notification was not found for the following manifests:
NJA0783745, NJA0784094, NJA1402002,
NJA1552982, NJA1552983, NJA1552984.

Be advised, EPA requires adherence to its regulations. If you have not already done so, you must take immediate remedial action to implement the regulations published in 40 C.F.R. Part 268. You must submit, within thirty (30) days of the receipt of this correspondence, documentation, and a description of the actions you have taken to correct the violations noted above and to implement the regulations published in 40 C.F.R. Part 268.

Failure to comply and submit the documentation requested in this Notice of Violation subjects you and/or your company to the enforcement provisions of Section 3008 of RCRA, 42 U.S.C § 6928.

If you have any questions regarding this matter, please contact Kellyann Few, at (212) 264-1362.

Sincerely yours,


George C. Meyer, P.E., Chief
Hazardous Waste Compliance Branch

cc: James Hamilton, Assistant Director
Office of Enforcement Policy
New Jersey Department of Environmental
Protection and Energy

bcc: Carolyn Carr, HQ RAATS
Joseph Clore, ISB

Please refer to the Instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



EPA

Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☐

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

NSD063144109

II. Name of Installation (Include company and specific site name)

T R I T E C H S E R V I C E S

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

4 C O R P O R A T E P L A C E

Street (continued)

City or Town

P I S C A T A W A Y

State

ZIP Code

N J 0 8 8 5 4 -

County Code

County Name

S O M E R S E T

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

N E W S O M E

J A M E S

Job Title

Phone Number (area code and number)

P L A N T E N G I N E E R

- -

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

☒☒

B. Street or P.O. Box

S A M E A S A B O V E

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

M E R R I L L L Y N C H (M L P F & S)

Street, P.O. Box, or Route Number

W O R L D F I N A N C I A L C E N T E R

City or Town

State

ZIP Code

N E W Y O R K

N Y

1 0 2 8 1 -

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner Indicator

(Date Changed)
Month Day Year

2 1 2 - 4 4 9 - 1 0 0 0

P

P

Yes

No

5/15/91 Ken Liti says Messon was a previous tenant. BL

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

1. Generator (See Instructions) ☐ 3. Treater, Storer, Disposer (at installation)
Note: A permit is required for this activity; see instructions.
- ☐ a. Greater than 1000kg/mo (2,200 lbs.)
☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
☐ a. For own waste only
☐ b. For commercial purposes
Mode of Transportation
☐ 1. Air
☐ 2. Rail
☐ 3. Highway
☐ 4. Water
☐ 5. Other - specify
- ☐ 4. Hazardous Waste Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketers
☐ c. Burner - indicate device(s) -
Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
- ☐ 5. Underground Injection Control

B. Used Oil Fuel Activities

1. Off-Specification Used Oil Fuel
☐ a. Generator Marketing to Burner
☐ b. Other Marketer
☐ c. Burner - indicate device(s) -
Type of Combustion Device
☐ 1. Utility Boiler
☐ 2. Industrial Boiler
☐ 3. Industrial Furnace
- ☐ 2. Specification Used Oil Fuel Marketer
(or On-site Burner) Who First Claims
the Oil Meets the Specification

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. EP Toxic (D000) ☒ (List specific EPA hazardous waste number(s) for the EP Toxic contaminant(s))
D 0 3 9 F 0 0 2 F 0 0 1

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1	2	3	4	5	6

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature



Name and Official Title (type or print)

JOHN M. NOLAN

Date Signed

EXP/C.O.O. 5/10/91

XI. Comments

This is a one time disposal of hazardous waste. No ongoing hazardous waste is anticipated.

Note: Mail completed form to the appropriate EPA Regional or State Office. (See Section III of the booklet for addresses.)

Kenneth Site



Notification of Hazardous Waste Activity

Please refer to the *Instructions for Filing Notification* before completing this form. The information requested here is required by law (*Section 3010 of the Resource Conservation and Recovery Act*).

Comments

[illegible]

Installation's EPA ID Number										Approved		Date Received (yr. mo. day)								
C	N	J	D	0	6	3	1	4	4	1	T/A	C								
F												1								

Nissan Motor Corp in U.S.A

Street or P.O. Box

[illegible]

City or Town															State		ZIP Code			
C	Piscataway															NJ		08854		
4																				

Street or Route Number

C	Street or Route Number																			
5	Same										middle									

City or Town															State		ZIP Code	
C																		
6																		

Name and Title (last, first, and job title)

C											Phone Number (area code and number)									
2	Havranek Charles										204 981 0220									

A. Name of Installation's Legal Owner

C. Name of Manufacturer's Legal Owner													B. Type of Ownership (enter code)	
R	The Sudler Co.													

VI. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity		B. Used Oil Fuel Activities	
<input checked="" type="checkbox"/> 1a. Generator <input type="checkbox"/> 2. Transporter <input type="checkbox"/> 3. Treater/Storer/Disposer <input type="checkbox"/> 4. Underground Injection <input type="checkbox"/> 5. Market or Burn Hazardous Waste Fuel <i>(enter "X" and mark appropriate boxes below)</i> <div style="margin-left: 20px;"> <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner </div>	<input checked="" type="checkbox"/> 1b. Less than 1,000 kg/mo.	<input type="checkbox"/> 6. Off-Specification Used Oil Fuel <i>(enter "X" and mark appropriate boxes below)</i> <div style="margin-left: 20px;"> <input type="checkbox"/> a. Generator Marketing to Burner <input type="checkbox"/> b. Other Marketer <input type="checkbox"/> c. Burner </div>	<input type="checkbox"/> 7. Specification Used Oil Fuel Marketer <i>(or On site Burner)</i> Who First Claims the Oil Meets the Specification

VII. Waste Fuel Burning: Type of Combustion Device (enter "X" in all appropriate boxes to indicate type of combustion device(s) in which hazardous waste fuel or off-specification used oil fuel is burned. See instructions for definitions of combustion devices.)

☐ A. Utility Boiler ☐ B. Industrial Boiler ☐ C. Industrial Furnace

VIII. Mode of Transportation (transporters only — enter 'X' in the appropriate box(es))

☐ A. Air ☐ B. Rail ☐ C. Highway ☐ D. Water ☐ E. Other (specify) _____

Mark 'X' in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA ID Number in the space provided below.

☒ A. First Notification
 ☐ B. Subsequent Notification (complete item C)

ID — For Official Use Only															
C														T/A	C
W															1

X. Description of Hazardous Wastes (continued from front)

A. Hazardous Wastes from Nonspecific Sources. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from nonspecific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
7	8	9	10	11	12

B. Hazardous Wastes from Specific Sources. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

C. Commercial Chemical Product Hazardous Wastes. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	38	39	40	41	42
43	44	45	46	47	48

D. Listed Infectious Wastes. Enter the four-digit number from 40 CFR Part 261.34 for each hazardous waste from hospitals, veterinary hospitals, or medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
----	----	----	----	----	----

E. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.21 — 261.24)

☐ 1. Ignitable
(D001)

☐ 2. Corrosive
(D002)

☐ 3. Reactive
(D003)

☐ 4. Toxic
(D000)

XI. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Signature <i>Charles Havranek</i>	Name and Official Title (type or print) Charles Havranek Administrative Supervisor	Date Signed 2/18/86
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EPA Form 8700-12 (Rev. 11-85) Reverse

1986 FEB 20 PM 1:46
NEW YORK, N.Y.
AGENCY, REGION II
ENVIRONMENTAL PROTECTION

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: January 15, 2015 - 4:39 PM

Version 5.0

User Selection Criteria

Location:	New Jersey, all activities	Activity Location:	None Chosen
Handler ID:	NJD063144109	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 01/15/2015		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

Results

Data meeting the criteria you selected follows.

Total Pages:5 Total Handlers:1

Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

Report Information

Name: cme_foia.rdf
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance
Deployed: June 2006
Last Updated: May 2012
Contact: rcrainfo.help@epa.gov
Tables Used: cmecomp3, ccitation3, hreport_univ5, lu_citation, lu_state, hid_groups
Libraries: none

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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MERRILL LYNCH PRODUCTION TECHNOLOGIES

County Name / Code: MIDDLESEX / NJ023

NJD063144109

Location: 4 CORPORATE PL; PISCATAWAY, NJ 08854

REGION 02

Mailing: 4 CORPORATE PL; PISCATAWAY, NJ 08854

Activity Location: NJ	State District: CENTRAL	Accessibility:	Non-Notifier:	Extract Flag: Y	Active Site: N
Generator: N	Transporter: N	Operating TSDF: -----	IC In Place: N	El Indicator (HE / GW): N / N	
Short-Term Gen: N	Transfer Facility: N	Offsite Receiver: N	HSM: N	Subpart K: ----	
Full Enforcement: -----	Converter: -----	State Unaddressed SNC: N	EPA Unaddressed SNC: N		
CA Wrkld: N	State TSDF: -----	State Addressed SNC: N	EPA Addressed SNC: N		
Active State Gen: N		State SNC w/Comp Sched: N	EPA SNC w/Comp Sched: N		

Violation:	Activity Location: NJ	Type: 268.A	Determined Date: 08/02/1993	Determined by Agency: EPA	Responsible Agency: EPA		
Scheduled Compliance Date: 02/22/1994		Actual Compliance Date: 02/10/1994		RTC Qualifier: OBSERVED	Sequence Number: 1		
CSE Evaluation	09/30/1993	Activity Location: NJ	By: EPA	Identifier: 000	Person: NJDG	Branch: C	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	08/02/1993	Activity Location: NJ	By: EPA	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 02/16/1994		Identifier: 000		
Docket:		Agency: EPA	Responsible Person: R2		Branch: RCB		
CA Component: N		Disposition Status:	Appeal Initiated:		Appeal Resolved:		

Violation:	Activity Location: NJ	Type: 262.B	Determined Date: 08/02/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 09/01/1993		Actual Compliance Date: 09/30/1993		RTC Qualifier: OBSERVED	Sequence Number: 1		
CSE Evaluation	09/30/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJDG	Branch: C	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
CEI Evaluation	08/02/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:	Focus Area:	
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 08/02/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:			

Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 08/02/1993	Determined by Agency: State	Responsible Agency: State		
	Scheduled Compliance Date: 09/01/1993		Actual Compliance Date: 09/30/1993	RTC Qualifier: OBSERVED	Sequence Number: 2		
CSE Evaluation	09/30/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJDG	Branch: C	Found Violation: YES
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	08/02/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
	Citizen Complaint: NO	Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

* Note: Penalty amount may not reflect all violations cited.

FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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MERRILL LYNCH PRODUCTION TECHNOLOGIES, NJD063144109, PISCATAWAY, NJ, continued -

Enforcement:	Activity Location: NJ	Type: 120	Action Date: 08/02/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:			
Violation:	Activity Location: NJ	Type: 262.A	Determined Date: 08/02/1993	Determined by Agency: State	Responsible Agency: State		
Scheduled Compliance Date: 09/01/1993		Actual Compliance Date: 09/30/1993	RTC Qualifier: OBSERVED	Sequence Number: 3			
CSE Evaluation	09/30/1993	Activity Location: NJ	By: State	Identifier: 000	Person: NJDG	Branch: C	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	08/02/1993	Activity Location: NJ	By: State	Identifier: 000	Person: R2DEP	Branch: NJ	Found Violation: YES
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
Enforcement:	Activity Location: NJ	Type: 120	Action Date: 08/02/1993	Identifier: 000			
Docket:		Agency: State	Responsible Person: R2DEP	Branch: NJ			
CA Component: N	Disposition Status:		Appeal Initiated:	Appeal Resolved:			
Evaluations With No Violations:							
CEI Evaluation	03/18/2010	Activity Location: NJ	By: State	Identifier: 001	Person: COMLE	Branch: C	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 03/18/2010		Focus Area:
CEI Evaluation	10/26/1999	Activity Location: NJ	By: State	Identifier: 000	Person: NJBR	Branch: C	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:
CEI Evaluation	08/20/1996	Activity Location: NJ	By: State	Identifier: 000	Person: NJBR	Branch: C	Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero:		Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

* End of Report *

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility Transports waste subject to RCRA regulations. ('Y' indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ('Y' indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist) GW - Groundwater Release ('+' indicates the exposure exists and is under control; '-' indicates the exposure exists and is not under control; 'N' indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ('Y' indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ('Y' indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ('Y' indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ('Y' indicates that the facility is in this universe).

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FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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Description of codes used on the report:

ACCESSIBILITY - indicates the reason why the handler is not accessible for normal RCRA tracking and processing (previously called Bankrupt Indicator):	
Code	Description
B	indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - indicates that the handler has been identified through a source other than Notification and is suspected of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	indicates that the handler is a former non-notifier.
X	indicates that the handler is a non-notifier.

Violation Type	Description
262.A	GENERATORS - GENERAL
262.B	GENERATORS - MANIFEST
268.A	LDR - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE
CSE	COMPLIANCE SCHEDULE EVALUATION

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

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